# **APPENDIX C**

# Response to Comments\_

Following are individual comments from the letters, faxes, and emails received and our responses to those comments.

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## Alternative A

1. Alternative A does not meet the requirements of the "no action" alternative as it is merely a temporary arrangement self-imposed by the FS. The no action alternative is the route system in place at the time of the forest wide LRMP, which was the basis for the travel management plan and our appeal to the Chief FS and subsequent litigation. Alternative A results in the removal of over 390 miles of NFS routes, along with an unspecified quantity of non-system roads and trails, from the current inventory.

Commenter 71, 152, 193, 385, 386, 679

**Response:** Thank you for your comment. Alternative A, the no action alternative, is a requirement of the National Environmental Policy Act (NEPA) at 40 CFR 1502.14(d). Development of the No-Action Alternative is described in Chapter 2 of the FEIS beginning on page 2-1. This description has been expanded upon and clarified in the FEIS, based on this comment and other similar comments. The routes that are not included in Alternative A are those roads or trails that have been closed to motor vehicle use or for which there is a pre-existing decision to close or restrict use. Also routes that have revegetated from non-use were also excluded.

2.I can't believe that CA is getting to the point there will be no place in CA to go camping, ride ATV's, or go 4 wheeling, unless you want to camp in a paved developed area. I'm angry on how things are going someone needs to stop all the BS because you're just making it worse not better. Those trails up there have been used longer then you have been around and it would be a shame if everything is shut down. I vote for Alternative A, No more Changes!

Commenter 14,

Response: Thank you for your comment

3. Support Alternative A.

Commenter 55, 63, 83, 72, 75, 76, 79, 81, 85, 369, 722, 1025, 1002, 153, 1015, 1017, 1025, 1074, 1094, 1095, 1096, 1097, 1098, 1099, 1103, 1107

Response: Thank you for your comment

4. The current use system is best, and the status quo should prevail.

Commenter 23, 369

Response: Thank you for your comment

5.I find the so called preferred Alternative "D" to be totally unacceptable, and if not selecting Alternate "A" the only other worthwhile proposed Alternate is "B".

Commenter 165

Response: Thank you for your comment

6. Expressed opposition to all alternatives other than Alternative A. None of the action alternatives provide a long term solution to a growing issue. The true answer is more expansion of these lands with specific designated areas for the various uses. Motorized recreationists really do not want to disturb the hikers, campers, and nature watchers with the sounds and distractions their vehicles. There needs to be a compromise. Please, do not support any alternative other than A or the modification of A to expand current acre usage.

Commenter 70, 168, 1103

**Response:** Thank you for your comment

7.I am concerned about the recent proposal to reduce the number of roads and trails open to public use and possible seasonal closure in the ENF. Reduction and closures for growing

numbers of users is not the solution. Maintenance, management, and better funding are. I favor the status quo and I urge you to make changes that are evolutional, not revolutional.

#### Commenter 25

Response: Thank you for your comment

8. True No Action alternative needs to be all routes on Alternative A but with the restrictions of no cross-country travel and seasonal closures as required, 12" of snow with no ground contact.

Commenter 8, 531, 679, 1107

**Response:** Development of the No-Action Alternative is described at the beginning of Chapter 2 in the FEIS. This description has been expanded upon and clarified, based on this comment and other similar comments. The routes that are not included in Alternative A are those roads or trails that have been closed to motor vehicle use or for which there is a pre-existing decision to close or restrict use. Also routes that have re-vegetated from non-use were also excluded.

9. There is no true 'no action' alternative. Alt A includes over 600 miles of closed routes. Why are 600 miles of existing routes being closed under the 'no action' alternative?

#### Commenter 637

**Response:** Development of the No-Action Alternative is described in Chapter 2 of the FEIS. This description has been expanded upon and clarified, based on this comment and other similar comments. The routes that are not included in Alternative A are those roads or trails that have been closed to motor vehicle use or for which there is a pre-existing decision to close or restrict use. Also routes that have revegetated from non-use were also excluded.

10. Alternative A is non-complaint with the Travel Management Rule as it doesn't eliminate cross-country travel. It is written to unfairly marginalize OHV users. As the intent of the route designation process is to eliminate cross country travel, implement Alternative A but ban cross-country travel.

Commenter 197, 209, 358, 360, 532

Response: One of the requirements in completing an Environmental Impact Statement is to describe and analyze the effects of the No Action Alternative (40 CFR 1502.14(d)). At this time in most areas on the ENF, cross country travel is not prohibited by regulation or Forest Order. To implement the national Travel Management Rule, the effects of prohibiting cross country travel must be analyzed and described, and a site-specific decision made to prohibit cross country wheeled motor vehicle use. Cross country travel is included in Alternative A because it is the No Action Alternative, and at this time cross country travel is not prohibited in most areas on the ENF.

11. Every Alternative except A simply closes trails and not one new linkage or new connection trail is proposed.

Commenter 1, 224

**Response:** In order to keep the scope of the project manageable and to be able to comply with the Court mandated timeline, John Berry, the Forest Supervisor at the start of the project, decided that construction of new routes are outside the scope of this project. This, however, does not preclude analyzing construction of new trails or connectors with the designated system in the future.

12. We agree with the DEIS that Alternative A is unacceptable, as it would not meet the Purpose and Need, and would not comply with the Court's Order.

Commenter 389

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Response: Thank you for your comment.

13. Alternative A is non-compliant with the court order. I perceive this alternative to be written to marginalize OHV users.

Commenter 358

- Response: Thank you for your comment. Alternative A, the no action alternative, is a requirement of the National Environmental Policy Act (NEPA) at 40 CFR 1502.14(d). Development of the No-Action Alternative is described at the beginning of Chapter 2 in the FEIS. This description has been expanded upon and clarified in the FEIS, based on this comment and other similar comments. The routes that are not included in Alternative A are those roads or trails that have been closed to motor vehicle use or for which there is a pre-existing decision to close or restrict use. In addition, routes that have revegetated from non-use were also excluded.
  - 14. The only prudent action by the USFS would be to propose an alternative closer to Alt "A" that provides roads and trails for current and anticipated demand, and eliminates concrete seasonal closures, yet provides for limited weather related closures.

Commenter 167,

**Response:** Thank you for your comment.

15. As you are not allowed to support the Blue Ribbon Coalition's alternative, please support alt. A. Alternative D would severely limit access to areas that our family frequents.

Commenter 12, 68

- **Response:** Thank you for your comment. The explanation of why the Blue Ribbon Coalition's proposed "Alternative R" was considered but not analyzed in detail is provided in the Alternatives Considered but Eliminated from Detailed Study in Chapter 2 of the FEIS. Thank you for your comment. In response to this and other comments, Alternative B was modified between the DEIS and FEIS. Modified B provides a higher level of access than Alternative D, which was the preferred alternative identified in the DEIS, while reducing impacts to certain resources.
  - 16. I support Alternative A. I would rather see more trails with the FS providing better management of the trails (occasional closure, rotating trail, wet weather closures, using public groups to help maintain public trails and public access).

Commenter 1055

- **Response:** Thank you for your comment. In response to this and other comments, Alternative B was modified between the DEIS and FEIS. Modified B provides a higher level of access than Alternative D, which was the preferred alternative identified in the DEIS, while reducing impacts to certain resources.
  - 17. Keep all routes and camping areas open. Any closures should be on an as needed basis. All alternatives, except Alternative A, are too restrictive and adversely effect our enjoyment of the natural resources
- Commenter 356, 375, 380, 439, 674, 679, 461, 720, 721, 722, 728, 739, 787, 857, 868, 869, 870, 1019, 1021, 1043, 1065, 1067
- **Response:** Thank you for your comment. As described beginning on page 2-1 of Chapter 2 of the FEIS, the routes that are not included in Alternative A are those roads or trails that have been closed to motor vehicle use or for which there is a pre-existing decision to close or restrict use. Also routes that have re-vegetated from non-use were also excluded.
  - 18. Received 525 signatures: in support of Alt A. Keep all roads, trails, spurs and dispersed camping open to what was open prior to 2005. Keep all areas in the Blue Lakes and Indian

Valley areas open. Any other Alt. will result in overcrowding and environmental damage to roads and adjoining public lands.

Commenter 380

**Response:** Thank you for your comment. Chapter 3 of the FEIS displays the environmental effects of implementing each of the Alternatives.

19. I support Alt A because I do not think closing PUBLIC lands is a very good idea in general. I think if the areas that have been closed for two years were re-evaluated the FS would find positive results in relation to environmental concerns addressed in the court case and ultimately the environmental impact as a whole. I think the closed areas should be measured and re-evaluated before any more trails and campgrounds are closed permanently through route alternatives B-E. The environmental issue was not addressed correctly by ENF before the 1990 ENF Off-Highway Vehicle and Trail Management Plan (1990 OHV Plan) was enacted. This oversight has brought us to where we are today and I do not think the wheeled motor vehicle owners should bear the burden of past NFS management mistakes or decisions.

Commenter 80

**Response:** Thank you for your comment. The interim closures that have been in place for the last two years under the Federal Court order are not represented by the No Action Alternative, but rather the No Action Alternative represents the condition prior to the Court order. The interim direction from the Court order is described in Chapter 1 of the FEIS.

20. Keep all routes in Alternative A open to four-wheeled motorized travel.

Commenter 483, 484, 659

**Response:** Thank you for your comment.

21. No alternative offers reasonable use, Alt A is closest; OHV use is profoundly limited as it is.

Commenter 414

Response: Thank you for your comment.

22. Implement Alt A. It allows the best recreational use of the ENF but the FS would need to extend the line on the map to Tells Creek Horse Camp.

Commenter 375, 379, 454, 974

**Response:** Thank you for your comment. The road to Tells Creek Horse Camp and Trailhead is now correctly shown as NFS road 13N22U. This road was inadvertently shown as an unauthorized route in some sections of the DEIS.

23. I would urge you to reconsider your proposed Alternative D and consider Alternative A with the following Motor Vehicle Use Map (MVUM) amendments: (1) Allow recreational motor vehicle access to all existing roads, logging roads, dead end spurs, jeep trails, motorcycle trails, hiking trails, ATV and snowmobile trails. Big game (ie., deer, bear, and elk) may be retrieved by motorized vehicles within 400 feet of the existing roads and trails (provided no meadows or streams are crossed. (2) Dispersed camping would be allowed within 100 feet of roads and trails. (3) Seasonal closures on all unsurfaced roads and trails will be from November 1 through March 31. Surfaced roads (ie., graveled, chip and sealed or asphalt) will remain open until 8 inches of snow is accumulated. Exceptions will be made for private property owners with recorded easements. (4) Minimum width requirements will be determined by the size of the motorized vehicle being used. No vehicle may used on a road or trail which is narrower than the vehicle being used. (5) Noise levels must be maintained below 75 decibels, which is the same requirement for boating

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equipment. (6) Helmets are required on all off road motorcycles, ATV and snowmobiles for riders under the age of 18. (7) Speed limits on all unsurfaced roads and trails will be 35 mph. The speed limit within 100 feet of any residence, campsite, person, livestock or animal is 10 mph. Slower traffic will allow others to pass safely. (8) All unlicensed off road vehicles and motorcycles must have off road permits issued by DMV.

Commenter 153

**Response:** Thank you for your comment. In response to this and other comments, Alternative B was modified between the DEIS and FEIS. Modified B provides a higher level of access than Alternative D, which was the preferred alternative identified in the DEIS, while reducing impacts to certain resources. Some of the other suggestions in this comment are outside of the scope of the project, or are already addressed by existing State or Federal laws and regulations, including the California Vehicle Code.

## Alternative B

1. Prefers Alternative B.

Commenter 180, 185, 705, 1003, 1006

Response: Thank you for your comment.

2. Alternative B could be made to be more acceptable with the addition of some high country routes to create loops and some street legal motorcycle opportunities. Also, the seasonal closure should be eliminated and replaced with a wet weather closure policy that actually meets the standards and guidelines, and is based on actual on the ground conditions.

Commenter 152, 156, 177, 385, 386, 727, 729, 747

Response: Thank you for your comment. Alternative B was modified based on this and other comments received. Modified B provides a high level of access while still minimizing impacts to certain resources. Although not all high country routes and loops are included, an effort was made to provide for recreation access, as described in Chapter 2 of the FEIS. An explanation of the basis for the seasonal closure has been added to the FEIS as Appendix D. The seasonal closure proposed in Modified B is considered to best provide protection of roads and trails when they are most prone to damage and rutting, while still providing flexibility during the times of year when wheeled motor vehicle use may be appropriate, based on soil moisture and rainfall conditions.

3. Implement Alternative B with the added written agreement to add roads and trails as OHV use evolves.

Commenter 53, 205

**Response:** Thank you for your comment. This decision will result in designated backbone system. However, this does not preclude adding, constructing, or closing routes in future analyses as described in the Implementation Strategy.

4. Alternative B would allow for the ENF to sufficiently comply with the court order and show Judge Karlton that the ENF is doing what was demanded. The Forest Supervisor should have discretion to open the forest during December and April based on precipitation and soil tests.

Commenter 80

**Response:** Thank you for your comment. Alternative B was modified based on this and other comments received. The seasonal closure proposed in Modified B is considered to best provide protection of roads and trails when they are most prone to damage and rutting, while still providing flexibility during the times of year when wheeled motor vehicle use may be

appropriate, based on soil moisture and rainfall conditions. An explanation of the basis for the seasonal closure has been added to the FEIS as Appendix D.

5. This Alternative offers little improvement over Alternative A. It leaves high route densities, impacting wildlife habitat, riparian areas, meadows, and other recreationists. It fails to meet the objectives of the Executive Orders and Travel Management Rule, and would require amending the Land Management Plan, which is unacceptable and unallowable, given the SNFPA ROD.

Commenter 389

Response: Thank you for your comment. Alternative B was modified between the DEIS and FEIS. Modified B provides a high level of access while adhering to Standards and Guidelines within the LRMP and minimizing impacts to certain resources, as described in Chapter 2 of the FEIS. The effects to recreation visitors, including those seeking quiet recreation opportunities are described in Chapter 3 in the Recreation, Wilderness, and Inventoried Roadless Areas sections. Modified B and the other action alternatives were developed to meet the objectives of the Executive Orders and the Travel Management Rule, as described in Chapter 1 of the FEIS under the Purpose and Need. Non-significant LRMP amendments are allowed provided they do not conflict with specific direction provided in the SNFPA ROD. The non-significant LRMP amendment proposed does not conflict with the SNFPA ROD.

6. Prefer Alternative B over the others, but do not like any of them.

Commenter 1036

Response: Thank you for your comment.

7. Select Alternative B, because once a route is closed, it is extremely difficult or impossible to reopen. Future closures should be considered on a case-by-case basis.

Commenter 1028

**Response:** Thank you for your comment. This decision will result in designated backbone system. However, this does not preclude adding, constructing, or closing routes in future analyses as described in the Implementation Strategy in Chapter 2 of the FEIS.

## Alternative C

1. Alternative C is unacceptable since it doesn't leave adequate opportunity for OHV recreation use

Commenter 385, 386, 483, 484, 532, 542

**Response:** Thank you for your comment.

2. Alternative C would need so much work to make it acceptable it really isn't worth the effort. It's elimination of the vast majority of high country trails to wheeled motorized use does not leave this alternative with adequate opportunity for OHV recreation use.

Commenter 152

**Response:** Thank you for your comment.

3. With the budget cuts, how does the forest service propose to repair future damaged areas in these over used areas that you proposed? I submit that if Alternative C is submitted as the proposed action then eventual radical environmentalist groups will be able to close all OHV in the ENF rather easily because the adverse effects these over used areas will have.

Commenter 13, 27

**Response:** Thank you for your comment. Reducing the total number of miles of routes does not necessarily lead to increased resource damage. Trails and roads in sensitive areas are more

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likely to sustain damage, even at lower levels of use. Trails and roads that are located in stable areas or otherwise avoid sensitive areas (archaeological sites, sensitive plant locations, etc.) can accommodate high levels of use without leading to resource damage. The Implementation Strategy presented in Chapter 2 of the FEIS describes how condition surveys will be completed and used to develop a maintenance schedule to avoid adverse impacts.

4. Support Alternative C for the wet season closure, with the modification of street legal vehicles not exempt from the 12 inch minimum snow depth.

Commenter 971, 972, 1072

Response: Thank you for your comment.

5. Support Alternative C with the addition of a substantial number of closures included in Alternative D.

Commenter 350

Response: Thank you for your comment.

6. Support Alternative C with modifications. It provides the best mix of road and trail access.

Commenter 361

**Response:** Thank you for your comment.

## Alternative D

Alternative D would remove too many roads from public access. Since timber sales
drastically declined, it is obvious that revenue is lacking as many roads, trails and other
amenities are in a sad state.

Commenter 180

**Response:** Thank you for your comment.

2. Preferred Alternative D is pragmatic and represents a balanced approach on the Amador Ranger District portion of the forest.

Commenter 214

Response: Thank you for your comment.

3. Alternative D would result in the loss of 60% of numbered routes. This is totally unacceptable.

Commenter 461, 652, 601, 667

**Response:** Thank you for your comment.

4. Support Alt D

Commenter 410, 411,642

**Response:** Thank you for your comment.

5. Oppose Alt D

Commenter 193, 420, 142, 471, 620, 648, 649

Response: Thank you for your comment.

6. Agree with all the routes in Alternative D.

Commenter 231

Response: Thank you for your comment.

7. Alt D shuts citizens out of the forest. It would make it where a citizen could not even see a creek, view a river.

Commenter 165

**Response:** Thank you for your comment.

8. Support Alternative D, but with modifications to further reduce impacts to sensitive meadows and riparian resources and at-risk watersheds, such as the Upper Cosumnes River and McKinney, Middle Dry, and Dogtown Creeks

Commenter 152, 333

**Response:** Thank you for your comment. Alternative B was modified based on this and other comments received. Modified B provides a higher level of access than Alternative D, which was the preferred alternative identified in the DEIS, while minimizing impacts to certain resources. The differences in effects between Alternative D and Modified B are presented in Chapter 3 of the FEIS.

9. Support Alternative D with the following modifications: Re-designate the Allan Camp trail 17E19 for ATV access

Commenter 154, 1083, 1113

**Response:** Thank you for your comment.

10. Support Alternative D with exceptions: All non-surfaced roads should fall under the "wet season" prohibition on wheeled vehicle use regardless of the snow depth. All roads in the Loon Lake Winter Non-motorized Winter Recreation Area, all roads leading to the Van Vleck Bunkhouse, all roads (not just the main road) leading to Robb's Peak Hut, the road to Echo Lakes, and the Woods Lake Road should be closed when covered in snow.

Commenter 159, 160

Response: Thank you for your comment.

11. Support Alt D with an increase in WOST snow depth.

Commenter 409

Response: Thank you for your comment.

12. The 268 ML2 roads on Alt D must be made open to street-legal and greensticker vehicles per NOI direction

Commenter 531, 601

**Response:** Thank you for your comment. Alternative B was modified based on this and other comments received. Modified B allows for all classes of public wheeled motor vehicles to use ML-2 roads that are consistent with standards and guidelines with the exception of routes downgraded from ML-3 to ML-2 that have a surface other than native material (eg. Chipseal, bituminous) are open for highway license vehicles only. Appendix F provides a rationale for each ML-2 road that is not designated or is designated street legal only.

13. Alt D will make it more difficult to hold field trips, do rock studies, explore old mines, etc.

Commenter 339

Response: Thank you for your comment.

14. Oppose Alternative D because a steady increase in OHV usage with a decrease in recreation opportunity can only lead to user conflicts.

Commenter 1052

**Response:** Thank you for your comment. Alternative B was modified based on this and other comments received. Modified B provides a higher level of access than Alternative D, which

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was the preferred alternative identified in the DEIS, while still minimizing impacts to certain resources. The differences in effects between Alternative D and Modified B are presented in Chapter 3 of the FEIS.

15. Alternative D hits the Silverfork area very hard, losing routes and access to many dispersed camping sites.

Commenter 1019

**Response:** Thank you for your comment. Alternative B was modified based on this and other comments received. Modified B provides a higher level of access than Alternative D, which was the preferred alternative identified in the DEIS, while still minimizing impacts to certain resources. The differences in effects between Alternative D and Modified B are presented in Chapter 3 of the FEIS.

16. Alternative D closes more than half of the legitimate routes that already exist for over half of the year, which amounts to only 25% of the access OHV users have helped develop over the decades.

Commenter 358

Response: Thank you for your comment.

17. Alternative D is not acceptable, but can be improved by adding routes to create some high country loops and provide street legal motorcycle opportunities.

Commenter 385, 386

**Response:** Thank you for your comment. Alternative B was modified based on this and other comments received. Although not all high country routes and loops are included in Modified B, an effort was made to provide for recreation access, as described in Chapter 2 of the FEIS.

18. Elkins Flat and Gold Note areas designate as in Alternative D, adding greensticker use to 08N46, 08N45, 14E35, and 08N48.

Commenter 1068

**Response:** Thank you for your comment. Alternative B was modified based on this and other comments received. Modified B allows for all classes of public wheeled motor vehicles to use ML-2 roads that are consistent with standards and guidelines with the exception of routes downgraded from ML-3 to ML-2 that have a surface other than native material (eg. Chipseal, bituminous) are open for highway license vehicles only. Appendix F provides a rationale for each ML-2 road that is not designated or is designated street legal only.

19. While the campsite on Silverfork Road just past mile marker 11 heading South is on Alt D, there is still a red carsonite showing 'no motorized vehicles'.

Commenter 439

**Response:** Public wheeled motor vehicle travel on the ENF is currently restricted to NFS roads and NFS motorized trails pursuant to a Federal court order. This interim direction is intended to apply until the new management direction from this FEIS is adopted.

20. Alternative D encourages non-motorized recreation activities. Provides for future generations & best chance for serenity, clean water, and fresh air.

Commenter 155, 157, 159, 160, 161, 162, 723, 724

Response: Thank you for your comment.

21. Alternative D very restrictive and will negatively effect our use of the forest system. Commenter 1038

**Response:** Thank you for your comment. Alternative B was modified based on this and other comments received. Modified B provides a higher level of access than Alternative D, which was the preferred alternative identified in the DEIS, while still minimizing impacts to certain resources.

22. Alternative D is wholly unacceptable. With the millions of acres of federal land out there, a 2 foot wide trail used for OHV dirt bike activities is not going to cause harm enough to measure against. I'm too tired of dealing with managers of the forest who think of it as there own personal property and do their best to keep me off my land.

Commenter 6

**Response:** Thank you for your comment.

23. Alternative D may limit woodcutting, vote for Alternative B

Commenter 727

Response: Thank you for your comment.

## Alternative E

1. I am one of the vast majorities of NF visitors who do not use off-road vehicles for recreation, and I believe Alternative E with modifications is appropriate.

Commenter 247,

Response: Thank you for your comment.

2. Alternative E best for protecting forest resources and increasing non-motorized recreation Commenter 222, 254, 417, 435

Response: Thank you for your comment.

3. The Washoe Environmental Protection Department (WEPD) supports Alternative E because it provides the greatest protection for the forest resources and provides greater opportunities for non motorized recreation. Alternative E provides the least mileage open for wheeled motor vehicle travel and would therefore result in possibly the least amount of impact to the cultural resources. The WEPD supports Alternative E because it does not allow motorized vehicles into inventoried roadless areas. Also provides the greatest amount of protection to the watershed and wildlife. Does not allow routes through meadows or routes with high potential for erosion, risk of spreading noxious weeds, or those that may damage or threaten sensitive plants and wildlife.

Commenter 170,

**Response:** Thank you for your comment. Alternative E was developed to focus on providing greater protection for forest resources and increasing opportunities for non-motorized recreational activities.

4. Support Alternative E.

Commenter 179, 346, 348, 1024, 1031, 1032, 1034, 1075, 1084, 1111, 1117

**Response:** Thank you for your comment.

5. We favor Alternative E. It allows ORV traffic on routes that arguably are resistant to erosion and do not place too much impact on fish and wildlife habitat or on other visitors to the forest. Alternative E keeps motor vehicles out of the meadows, it gives the best protection to wildlife habitat and it is best in protecting the special values of inventoried roadless areas and wilderness.

Commenter 174

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- **Response:** Thank you for your comment. Alternative E was developed to focus on providing greater protection for forest resources and increasing opportunities for non-motorized recreational activities.
- 6. Urge you to adopt Alt E. Alt E is very important in protecting sensitive habitat, watersheds and unprotected wilderness from motorized vehicles. Alt E reduces damage from other threats such as fire, noxious weeds, and habitat fragmentation.

Commenter 216

**Response:** Thank you for your comment. Alternative E was developed to focus on providing greater protection for forest resources and increasing opportunities for non-motorized recreational activities.

7. Oppose Alternative E.

Commenter 3, 542

**Response:** Thank you for your comment.

Adopt E with following changes: do not designate Rubicon River area, Hunters trail, Gray's trail, Deer Creek trail to avoid user conflict

Commenter 216, 218, 247, 250, 338, 343, 345, 347, 429

**Response:** Thank you for your comment.

8. Alternative E represents the highest potential to move Riparian Conservation Areas into compliance with the objectives, resulting in a higher potential to support viable populations of aquatic and aquatic-dependent species and reduces the potential for spreading of noxious weeds, minimizes habitat fragmentation, especially old forest habitat, and minimizes the risk of fire, which is associated with roads.

Commenter 389

**Response:** Thank you for your comment. Alternative E was developed to focus on providing greater protection for forest resources and increasing opportunities for non-motorized recreational activities.

9. Alt E has a decrease in miles, but there is a large number of routes that end in the middle of the Forest. This encourages cross-country travel and makes enforcement difficult.

Commenter 382

**Response:** During the public scoping period, a large number of Forest users expressed an interest in preserving spur routes that dead end in the Forest. These routes fulfill the purpose and need by providing a number of recreation opportunities, including access to hunting spots, fishing holes, and dispersed camping. A proliferation of cross-country travel leading from spur routes would necessitate mitigation to eliminate the problem or closure of the route to public wheeled motorized use.

10. Support Alternative E for the dry season, but included the modifications: prohibition of OHV use on all native surfaced roads extended to Nov 1 to April 30, increase WOST depth requirement.

Commenter 340, 338, 419, 421, 427, 640, 641, 643, 644, 646, 647, 1072, 1084

Response: Thank you for your comment.

11. Please choose Alternative E. Please establish a designated off-highway vehicle (OHV) route system to confine vehicle use to a reduced number of existing roads and trails and keep mechanical vehicles out of sensitive habitat, watersheds, and unprotected wildernesses.

Commenter 1062

**Response:** Thank you for your comment. Alternative E was developed to focus on providing greater protection for forest resources and increasing opportunities for non-motorized recreational activities.

12. Prefer Alternative E because: eliminates motorized use from IRAs and Caples Creek Proposed wilderness area, eliminates motorized vehicles on meadows with the most protection for TES plant species. Only Alternative E maintains the option of designating more Wilderness Areas on the ENF in the future.

Commenter 398, 1056, 1058, 1072

- **Response:** Thank you for your comment. Alternative E was developed to focus on providing greater protection for forest resources and increasing opportunities for non-motorized recreational activities. The selection of any of the alternatives would not preclude the designation of future, additional Wilderness Areas on the ENF.
- 13. Prefers Alternative E, with the additional removal of the Rubicon Canyon and Caples proposed wilderness routes, specifically 10N14, 10N14B, and an unnumbered route north from 10N14B and 17E17.

Commenter 635, 971, 972, 1037

**Response:** Thank you for your comment.

14. As required by the Travel Management Rule, the Forest Service must "provide the minimum transportation system needed for safe and efficient travel by the public and for administration, utilization and protection of NFS lands." The DEIS fails to define the project within the context of that minimum system. Alternative E, which is generally preferable to any other Alternative, exceeds the minimal system needed.

Commenter 389

- Response: Thank you for your comment. Federal regulations relating to NFS road management (36 CFR 212.5(b)) direct that the FS should identify the minimum road system needed for safe and efficient travel and for the administration, utilization, and protection of National Forest System lands. The minimum system is the road system determined to be needed to meet resource and other management objectives as set forth in the LRMP, to meet other laws and regulations, to reflect long-term funding expectations, to ensure that the system minimizes adverse environmental impacts associated with road construction, reconstruction, decommissioning, and maintenance. The analysis of effects from implementing each of the alternatives presented in Chapter 3 of the FEIS informs the Forest Supervisor in making a decision regarding the minimum system, considering among other elements, the safe and efficient utilization of the ENF by the public along with potential adverse impacts. In making his determination, the Forest Supervisor will consider the direction provided in the ENF LRMP. The ENF LRMP describes that the Forest goal for recreation is to provide a wide range of developed and dispersed recreation opportunities (Page 4-2 of the ENF LRMP).
- 15. Alternative E protects all the traditional Forest values of quiet, ample places for wildlife, and water resource protection

Commenter 345, 346, 347, 370, 713, 736, 854, 860, 861, 873, 882, 895

- **Response:** Thank you for your comment. Alternative E was developed to focus on providing greater protection for forest resources and increasing opportunities for non-motorized recreational activities.
- 16. Support Alt. E otherwise- motorcycle designation would degrade the quality of the climbing experience of Lover's Leap (11N26B) for climbers and hikers. Closure of this area protects the historic character and preserves the trails

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#### Commenter 348

Response: This area was identified during public scoping as one that various interests were concerned about. Certain users recommended that motorcycle use continue to be allowed on the trail as it provides a unique high country opportunity in a scenic setting. Others requested that the trail be closed to motorized use to allow for undisrupted non-motorized recreation. In order to display the effects of different management scenarios, this trail was proposed to be open or closed to motorized use in different ways in different alternatives. One of the factors considered in determining the different alternatives was conflicts between motorized use and other recreational uses as set forth in Executive Order 11644 and the evaluation criteria in the Travel Management Rule (36 CFR 212.55).

17. Alternative E is totally unacceptable. Part of the justification/description for this alternative.

"Increasing opportunities for non-motorized recreational activities." Falls outside the scope of the project and outside the stated Purpose and Needs

Commenter 3, 53, 152

**Response:** Thank you for your comment. The intent of this alternative is considered to be consistent with the Purpose and Need for this project, as presented in Chapter 1 of the FEIS, in that it is providing the public wheeled motor vehicle route access to dispersed recreation opportunities and otherwise providing for a spectrum of recreation opportunities.

18. Alternative E does not meet any of the OHV recreation planning objectives, and hence it is not a complete alternative and should not have been included in the final array of alternative plans for analysis.

Commenter 385, 386

**Response:** This Travel Management project addresses all public wheeled motor vehicle use, not just OHV use. As such, it is not inappropriate to have one alternative that is not designed to meet OHV objectives. As explained in Chapter 2 of the FEIS, Alternative E focuses on providing greater protection for forest resources and increasing opportunities for non-motorized recreational activities. Its primary intent was to meet Significant Issue Statement 2 by reducing route proliferation, improving enforcement ability, reducing user conflicts and impacts to non-motorized recreation, and reducing impacts to forest resources.

## Alternative R

1. Support Alternative R.

Commenter 1030, 1065, 1068

**Response:** Thank you for your comment.

2. Develop Alternative R into a full-fledged, stand-alone alternative. Perform a supplemental EIS to include this alternative since the DEIS requires at least one pro-recreation alternative that includes a substantive route network meeting future needs

Commenter 1, 74, 91, 92, 93, 130, 131, 132, 142, 145, 146, 177, 182, 186, 187, 188, 190, 191, 192, 193, 197, 199, 208, 209, 215, 220, 257, 263, 271, 282, 304, 314, 315, 316, 317, 353, 358, 360, 366, 385, 386, 399, 402, 403, 408, 420, 436, 438, 442, 443, 450, 471, 565, 601, 620, 637, 649, 651, 653, 601, 439, 667, 672, 673, 677, 679, 680, 191, 688, 689, 690, 693, 703, 704, 461, 720, 721, 751, 231, 758, 759, 760, 761, 763, 766, 767, 768, 770, 771, 773, 775, 777, 786, 788, 789, 790, 791, 801, 803, 804, 805, 806, 807, 809, 810, 813, 814, 815, 817, 819, 820, 821, 822, 823, 826, 827, 829, 830, 831, 833, 834, 835, 836, 837, 838, 839, 840, 841, 842, 843, 844, 845, 846, 847, 848, 849, 850, 851, 852, 853, 856, 886, 891, 919, 973, 1028, 1046, 1047, 1108, 1109

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**Response:** The explanation for why Alternative R was considered but not analyzed in detail in this FEIS is presented in the Alternatives Considered but Eliminated from Detailed Study section of Chapter 2 in the FEIS. As described in that section, several elements of this proposal are outside of the scope of the decision to be made or do not meet the purpose and need, specifically elements 5, 6, 7 and 9.

3. BRC suggested the ENF designate at minimum all of the 2,830 miles of roads and trails receiving current OHV use unless the individual route(s) are causing a "considerable adverse affect." If a considerable adverse affect is found, review for mitigation (reroute, maintenance, closure, etc.). However, the Forest Supervisor determined it would not be feasible, nor advisable to add so many unauthorized routes to the current NFTS. The alternatives considered in detail explore a reasonable range of alternatives given current and expected limitations on funding and management capability. The Facilities section in Chapter 3 of the FEIS displays that the ENF already suffers from a backlog of maintenance needs on its current transportation system and is already stretched to accomplish basic maintenance needs, even without adding more roads or trails to the NFTS. The BRC is suggesting that most of the 526 miles of inventoried unauthorized routes be added to the NFTS. It would simply not be feasible to manage and maintain this large of a transportation system. Further, the ENF is limited in time and funding available to study and analyze the environmental impacts of unauthorized routes and prescribe needed mitigation as described. Considering the availability of resources for maintenance and administration, this suggestion is not feasible.

BRC also suggested allowing use on existing routes except those that are causing "considerable adverse affects", where those affects can not be mitigated. This standard is used in the travel management regulations in regards to the implementation of temporary, emergency closures (36 CFR 212.52(b)(2)), but is not the correct standard in regards to designating routes to be open to motor vehicle travel. The travel management regulations at 36 CFR 212.55 present the criteria to be considered in designating roads or trails for motor vehicle use. These criteria are derived, in part, from the Executive Orders, and they are more encompassing than the standard listed in the proposed Alternative R. In addition, the proposal does not indicate which routes are considered not to be causing considerable adverse effects, nor which of these routes can be mitigated or what that mitigation would be.

The BRC proposal does not recommend allowing cross-country travel, which is allowed in Alternative A. However, the effects analysis in Chapter 3 of the FEIS clearly describes the effects of this activity in the description of effects for Alternative A, so that those impacts can be considered separately by the deciding officer.

Based on the comments received in response to the DEIS, the Forest Supervisor did not find a compelling argument to warrant the need for a supplement to the DEIS. The ENF developed Alternative B, in order to maximize motorized recreation opportunities while still meeting the purpose and need for the project. Alternative B was later modified based on public comments and attempted to provide a high level of public motorized access. While Alternatives B and Modified B do not achieve all of the goals suggested by the BRC, many of their suggestions were incorporated into these alternatives.

Regulations relating to the preparation of an EIS describe that the EIS must include reasonable alternatives. There is no requirement that the EIS include at least one alternative that is pro-recreation or one that meets future needs. In the preamble for the national Travel Management regulations, it is stated that it is not possible to accommodate all user demands on all National Forests while also protecting water quality, wildlife habitat, and other natural resources that people come to enjoy. The travel management regulations provide for revision of designations as needed to meet changing conditions. New routes may be constructed and

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added to the system following public involvement and site-specific environmental analysis. Such revisions may also include closures or changes in designations.

Build a new alternative using Alt R suggestions as a starting point. DEIS is replete with statistics which show nearly a 50% decrease in accessibility across the board.

#### Commenter 339

- **Response:** The explanation for why Alternative R was considered but not analyzed in detail in this FEIS is presented in the Alternatives Considered but Eliminated from Detailed Study section of Chapter 2 in the FEIS. As described in that section, several elements of this proposal are outside of the scope of the decision to be made.
- Tables showing the number of miles of roads or trails where public wheeled motor vehicle use will be allowed have been simplified and corrected in the FEIS to more accurately show the miles of routes upon which a decision is being made. In the DEIS, in some tables for Alternative A, the miles of State and County roads were included, yet these miles were not included in the other alternatives. The Comparison of Alternatives table in Chapter 2 of the FEIS compares the miles available in the different alternatives, and includes a footnote displaying the miles of State and County roads within the ENF that are not affected by this decision. Some tables in the DEIS included miles of ML-3 roads open for highway legal vehicles only, whereas some tables did not include this mileage. This has been corrected and clarified in the FEIS.
- The national Travel Management regulations do not require that previous travel management decisions be reconsidered in this FEIS. Across the ENF, these previous decisions have resulted in 166 miles of NFS ML-2 roads that are currently closed to public wheeled motor vehicle travel and an additional 240 miles of NFS ML-1 roads that are physically closed to motor vehicle travel.
- These clarifications show the greatest reduction in the number of miles of roads and trails where public wheeled motor vehicle use will be allowed is between Alternative A and Alternative E. This does not include the 334 miles of State and County roads on the ENF, nor the 331 miles of roads and trails within the Rock Creek Recreational Trails Area.
- 4. None of the five proposed alternatives are acceptable without significant modification. I am very disappointed that the proposed alternative outline submitted by the Blue Ribbon Coalition, Alternative R, was not given more serious consideration as it could have been turned into a very manageable alternative.

Commenter 152, 221, 230,

Response: Alternative R was considered in the analysis, and was considered as the alternatives were being developed for the DEIS and FEIS. The explanation for why Alternative R was considered but not analyzed in detail in this FEIS is presented in the Alternatives Considered but Eliminated from Detailed Study section of Chapter 2 in the FEIS As described in that section, several elements of this proposal are outside of the scope of the decision to be made. One of the primary elements of the Blue Ribbon Coalition's proposed alternative that was not carried forward into any of the action alternatives was the inclusion of a large number of the existing unauthorized routes. These were not included in the action alternatives because at the outset of this project, the Forest Supervisor specified that this project is to establish a "backbone" system of roads and trails to be available for public wheeled motor vehicle use. Routes may be added to the travel management system in the future, or other revisions made in the system. The Implementation Strategy presented in Chapter 2 of the FEIS includes an element, whereby the ENF will work with a collaborative group of public stakeholders to develop a process for considering the addition of routes or changes in management of the

designated system. This strategy would be completed within one year after the collaborative group is established.

## **Access**

1. Hardship for recreational users if they can't get off of main roads.

Commenter 1003

Response: Thank you for your comment.

2. Forest should explore every mitigation option before considering closing.

Commenter 305, 306, 383

**Response:** Thank you for your comments.

3. Closing is not management;

Commenter 301, 310, 325, 702, 782, 623

**Response:** Thank you for your comments.

4. By not considering viable alternatives, including some which may require Forest plan amendments, the FS is in violation of the Court Order and its own policy of providing a diversity of road and trail opportunities for experiencing a variety of environments.

Commenter 360

**Response:** Thank you for your comment. In altervatives B—D, non-significant Forest Plan amendments are proposed for routes that pass through meadows but also provide a unique recreation opportunity or access to a popular location. The description of alternatives in Chapter 2 of the FIES explains the variety of environments to which each of the alternatives provides access.

Despite higher OHV usage and goals in the LRMP to add to the OHV trail system, the DEIS proposes to reduce trail mileage and wipe out much of the scenic and highly prized routes on the Forest.

## Commenter 383

**Response:** Thank you for your comment. In an effort to keep the scope of the project manageable and to be able to comply with the Court mandated timeline, the Forest Supervisor at the start of the project, decided that construction of new routes would be outside the scope of this project. The national Travel Management regulations at 36 CFR 212.54 provide for revision of designations as needed to meet changing conditions, including the potential to add new routes following public involvement and site specific environmental analysis.

6. Please don't close any OHV roads or trails. Please keep the roads and trials open.

Commenter 192, 194, 227, 225, 263, 305, 306, 308, 309, 318, 320, 321, 322, 323, 326, 327, 330, 660, 670, 687, 694, 695, 696, 697, 709, 719, 738, 739, 812, 832, 858, 867

**Response:** Thank you for your comment. The national Travel Mangement Rule requires the prohibition of cross-country travel and designating a system of roads and trails open for public wheeled motor vehicle use. Chapter 3 in the FEIS highlights the analysis used for determining which routes are appropriate for wheeled motor vehicle use in the alternatives.

7. There is no consideration for the areas that have a high density of trails beyond the trail mile per acre consideration. Very little effort was made to realize that these areas serve a purpose in that a lot of them are close to camping areas, they provide small loop opportunities for children and lesser skilled riders and keep novice riders entertained with variety so they do not venture off to areas where there skill level becomes a problem. A trail system needs to be looked at with a "ski area" mentality. There has to be a "bunny hill" even at the expert resort.

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This current proposal eliminates an excessive amount of the truly technical trails and also takes a significant amount of the loop opportunities away and at the same time minimizes the novice-level trails.

## Commenter 61

- **Response:** Alternative B was modified in response to public comments on the DEIS. Modified B (the preferred alternative) was designed to provide a high level of motorized recreation opportunities and access across the forest. See Chapter 2 for an in-depth description of Modified B.
- 8. I am truly amazed and appalled by the options that have been described, and even more so by the "preferred" option of the EDNF. Asking an individual like me to respond to the trails or routes that I am most interested in "saving" is like asking a parent to choose which of their children they must sacrifice. There is no choice for me to make. I have so many "favorite" trails/routes within the ENF alone; Barrett Lake, Deer valley and Hell Hole to name a few.

#### Commenter 211

- **Response:** Thank you for your comment. In response to this and other public comments, as well as additional information, Alternative B was modified between the DEI and FEIS. Modified B provides a higher level of access than Alternative D (the preferred alternative identified in the DEIS) while minimizing impacts to certain resources.
- 9. My concern is that this trail will be shut down, which is not right, due to the fact that no one will have a spot for the following: camping, 4-wheel driving, hiking, and fishing the back lakes.

#### Commenter 240

Response: Thank you for your comment.

10. Leave enough trails open so that there are no traffic jams.

Commenter 1092

**Response:** Thank you for your comment.

11. The DEIS ignores the growth pattern of increased trail interest.

#### Commenter 705

- **Response:** Thank you for your comment. In an effort to keep the scope of the project manageable and to be able to comply with the Court mandated timeline, the Forest Supervisor at the start of the project, decided that construction of new routes would be outside the scope of this project. The national Travel Management regulations at 36 CFR 212.54 provide for revision of designations as needed to meet changing conditions, including the potential to add new routes following public involvement and site specific environmental analysis.
- 12. This process should have been looked at as an opportunity to legitimize existing roads and trails, not as a welcome excuse for the ENF to reduce use by an ever growing segment of the population.

#### Commenter 1108, 1109

Response: Thank you for your comment. This project is to establish the "backbone" of a travel management system, consistent with the national Travel Management regulations and the requirements of a recent Federal Court order. In response to this and other public comments, as well as additional information, Alternative B was modified between the DEIS and FEIS. Modified B provides a higher level of access than Alternative D (the preferred alternative identified in the DEIS) while minimizing impacts to certain resources.

13. The DEIS does not mention the miles of motorcycle trails that have already been closed over the years

#### Commenter 893

**Response:** Thank you for your comment. The Travel Management EIS requires that the impacts of implementing each of the alternatives be analyzed in detail. Any trails that have been closed prior to this project were done so using a similar environmental analysis and were not part of the current analysis.

14. Maintain access to all existing roads, trails, logging roads, dead-end spurs, jeep trails, motorcycle trails, bypasses, turnouts, ATV and snowmobile trails. Access for types of vehicles should be determined by minimum width of route. Access for fire not adequate under action alternatives because brush growth would prevent use of not designated routes. Guarantee recreational use of all public lands.

#### Commenter 153, 828, 1108, 1109

**Response:** This project is to establish the "backbone" of a travel management system, consistent with the national Travel Management regulations and the requirements of a recent Federal Court order. In response to this and other public comments, as well as, additional information, Alternative B was modified between the DEIS and FEIS. Modified B provides a higher level of access than Alternative D (the preferred alternative identified in the DEIS) while minimizing impacts to certain resources.

15. Use roads for camping, hiking, fishing, four-wheeling; leisure and a stress reducer. Keep trails open for recreation of all.

Commenter 92, 93, 106, 114, 116, 117, 118, 128, 129, 132, 134, 142, 145, 238, 239, 241, 255, 259, 260, 262, 277, 282, 284, 285, 287, 289, 290, 293, 299, 379, 440, 448, 449, 451, 453, 455, 457, 462, 465, 471, 478, 626, 628, 629, 672, 881, 942, 1092

Response: Thank you for your comment.

16. I would like to express my dissatisfaction in you and your group's proposal to close and restrict access to trails which have been open to the public since settlers started to inhabit our great forests. Let those who use the forest responsibly be part of the solution. These lands are supposed to be public lands, for the public to enjoy and take care of. Please do not close our trails or restrict access to those precious places. If such things happen then these trails will not be policed as you will think they are closed. The people who do harm will continue to do so and worse since the trails won't be monitored any more by responsible users. Let responsible users be part of the solution.

## Commenter 16

**Response:** Thank you for your comments. All routes on the Forest are being considered and evaluated in this process regardless of whether they are NFS or Non-NFS routes. The use of motorized routes has environmental effects that need to be considered in the analysis before routes can be designated open for public motor vehicle use. (This was in the comment document. No commenter number.) The Implementation Strategy in Chapter 2 of the FEIS highlights the intent of the ENF to utilize volunteers to help maintain the system and educate Forest visitors about the designated route system.

17. I'm distressed that as a result of this forest plan, we responsible OHV riders face significant loss of recreational opportunity. It is needlessly punitive to the OHV community to close trails which have been established and in use for decades, in some cases. I find nothing from Judge Karlton that forces you to exclude informal trails. I encourage you to reassess these closed trails, in an effort to provide more, not less, recreation for the growing OHV community.

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#### Commenter 60

- **Response:** Thank you for your comments. In response to public comments, Alternative B has been modified to provide increased Forest access, while at the same time minimizing impacts to certain resources. Modified B provides 213 miles of trails for OHVs.
- 18. Include in the final approved alternative all of the historic access routes that have been left off of all of the alternatives to be included within the Travel Management Plan. Historic routes are part of the experience of traveling on trails in the forest and getting in touch with the history of the area.

#### Commenter 197

**Response:** Thank you for your comments.

19. Reconsideration of closing roads due to historical reasons (part of the Pony Express?)- allow the continued use that has been just as historical over these roads as the Pony Express has been.

#### Commenter 371

Response: Thank you for your comment.

20. Explain how Forest access now means limited or restricted uses of the area. Motorized dispersed camping has been popular in the Blue Lakes and Indian Valley areas since the 1920's. Why, 100 yrs later, is the ENF closing routes to activities that have been done for years?

#### Commenter 380

- Response: The national Travel Management Rule requires the prohibition of cross-country travel and designating roads and trails for public wheeled motor vehicle use. In Appendix G of the FEIS, the rationale for not allowing public wheeled motor vehicle use on a ML-2 road in Modified B, the Preferred Alternative, is listed. Also, Appendix H shows the rationale for considering allowing use on ML-1 roads.
- 21. Please provide legal riding access. Without legal places to go, OHV riders will ride illegally. Commenter 1029, 1079
- **Response:** Thank you for your comment. Based on this and other public comments, Alternative B was modified. Modified B, the preferred alternative provides for 919 miles of roads and 213 miles of trails for OHVs.
- 22. Citizens have the right to explore these lands and have access in a means that is appropriate. Hiking alone is not enough. There is a very large industry catering to off-roading in CA that would be greatly impacted if more trails continue to get closed.

## Commenter 21

- Response: The new travel management rule revised regulations at 36 CFR parts 212, 251, 261, and 295 to require designation of roads, trails and areas for motor vehicle use on all national forests. The final rule provides a consistent framework for local units to designate roads, trails and areas open to motor vehicle use, by class of vehicle, and if appropriate, by time of year. The final rule provides better opportunities for sustainable motorized recreation, better resource protection, increase public safety and ample high quality access to national forest system land.
- 23. The Final EIS contains a discussion on the local economic effects on pages 3-256 and 3-257. According to the 2003 National Visitor Use Monitoring (NVUM) study, approximately 7.4 percent of the 2.12 million visitors identified OHV travel as their primary or secondary recreational activity. The NVUM survey also collected information on the visitor's spending

within 50 miles of the Eldorado National Forest during their recreational visit. The results showed an overnight visitor spent an average \$125 per party per trip and day-visitors spent an average of \$30 per party per trip. Purchases of fuel and groceries make up over 50 percent of the total spent. The information available regarding per-trip expenditures indicate that revenue generated from recreation visits to the Forest may be significant for individual businesses, but is only a small percentage of the overall economy.

24. Eliminating access for hunters and fishermen.

## Commenter 1038

**Response:** Thank you for your comment. Hunters and fishermen do have differing degrees of access by wheeled motorized vehicles. Alternative A (the No-Action Alternative) has the most miles of roads and trails available for use by wheeled motorized vehicles. Alternatives B through E have varying amounts of access by wheeled motorized vehicles. With all of the alternatives, there would continue to be some level of access using wheeled motorized vehicles. Alternative B was modified in-part due to this and other similar comments. Modified B provides for a greater diversity of routes available to broader spectrum for forest uses such as hunting, fishing, and dispersed camping.

25.OHV are the fastest growing use group of the NF and the NF rather than embracing this group is doing all it can in its power to restrict their access to the NF. In the implementation strategy it says "collaborate with public stakeholders", but the FS has already lost all of our support.

#### Commenter 371

**Response:** Thank you for your comment.

26. I want our children to be able to wheel and camp in the woods. Without access to our trails our kids are going to grow up on the streets and in gangs.

#### Commenter 1057

**Response:** Thank you for your comment. In response to your input and the input of others, we have modified Alternative B to provide a higher level of motorized access than Alternative D, while still minimizing impacts to certain forest resources. Modified B allows access to 213 miles of trails throughout the Forest.

27. Solution is not by closing off access to public lands. I think rather responsible use should be taught and enforced.

## Commenter 1064

**Response:** Thank you for your comment.

28. Maintain OHV access on trails over 48" width

#### Commenter 416

Response: According to the Travel Management Rule, a trail is a route under 50 inches or less in width or a route that is over 50 inches wide and managed as a trail (36CFR212.1). In response to public comments on the DEIS, Alternative B was modified in the Final EIS. It was designed, in part, to provide a high level of motorized recreation opportunity and access across the forest. As is shown in Chapter 2 of the FEIS, Modified B allows public wheeled motor vehicle use on 1009 miles of native surface roads, which are greater than 48" wide, and 213 miles of trails.

29. Will do a grave disservice (to the public) if you close even just one trail to off-trail travel. Commenter 1020

**Response:** The Travel Management Rule (36CFR212) prohibits public motor vehicle travel off of designated roads and trails.

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## 30. Open unless signed closed

## Commenter 651, 673, 1108, 1109

**Response:** The Travel Management Regulations 36 CFR 212 specifies that the designated roads and trails shall be identified on a motor vehicle use map (MVUM). The regulations do not require that the route be signed open to identify routes that are available for public use. The motor vehicle use map would be the principle means to identify which routes are open for public use. However, we do understand the benefits of clear, adequate signage. Therefore, we state that we will provide clear, consistent signing that identifies routes open by vehicle type corresponding to the MVUM.

31. Routes should be 'closed unless signed open"

#### Commenter 417

**Response:** The Travel Management Regulations 36 CFR 212 specifies that the designated roads and trails shall be identified on a motor vehicle use map (MVUM). The regulations do not require that the route be signed open to identify routes that are available for public use. The motor vehicle use map would be the principle means to identify which routes are open for public use. However, we do understand the benefits of clear, adequate signage. Therefore, we state that we will provide clear, consistent signing that identifies routes open by vehicle type corresponding to the MVUM.

32. Instead of closing a route with a specific concern, designate the route "contingent" until volunteers are able to re-route it.

#### Commenter 703

**Response:** Thank you for your comment. This project is to establish the "backbone" of a travel management system, consistent with the national Travel Management regulations and the requirements of a recent Federal Court order. Contingent designations are considered to be outside the scope of this project. The national Travel Management regulations at 36 CFR 212.54 provide for revision of designations as needed to meet changing conditions, including the potential to add new routes following public involvement and site specific environmental analysis.

33. Gates cause more problems, such as in the case of vehicles going down Silverfork from Iron Mountain and not being able to get out

## Commenter 379

**Response:** Thank you for your comment.

34. Concern about access to cabins. FS paved roads should have no restrictions and gates should not limit access to cabins due to early or late seasonal closures [currently access is limited only to seasonal snow]. Should be able to access cabin by snowmobile like always. Concern that roads within tracts that are maintained by cabin owners and our use is authorized by permits are not on maps. Please ensure any alternative does not adversely effect the use of our cabins.

#### Commenter 862

Response: Snowmobiles are excluded from the Travel Management decision since the Travel Management rule focuses on public wheeled motor vehicle travel. The terms and conditions of the special use permit for recreational residences determine how and when the access is provided. The routes in the tracts that are not shown in the Alternatives of the FEIS will need to be part of the authorized uses in the special use permits for recreation residences. The holders of the special use permits for the recreation residences will continue to have authorization for uses specified in their permit after the decision is made in this FEIS.

35. Historic and current residential cabins should not be closed to permit holders or the public. Commenter 335

**Response:** Thank you for your comment. The holders of the special use permits for the recreation residences will continue to have authorization for uses specified in their permit after the decision is made in this FEIS. People who do not have a special use permit for a recreational residence would be subject to management requirements specified in the selected alternative.

36. Support reducing the number of motorized trails.

Commenter 1111

**Response:** Thank you for your comment.

## Access/Maintenance (Public Stewardship/Volunteer) General

1. My club, organization and myself would be willing to adopt the following areas for maintenance issues, campsite cleaning etc: 09N12 and spurs, 09N10 and spurs,

Commenter 531

**Response:** Thank you for your comment. The implementation strategy outlined in Chapter 2 of the FEIS identifies a public volunteer strategy be developed within six months of the final decision. Identifying volunteer opportunities is a critical aspect of implementing the final decision so the ENF expects to work with volunteers whenever appropriate.

2. We caution against the reliance on volunteers or an "adopt a trail" strategy. Strawberry 4x4 Trail (10N13) is a prime example of a trail that is in horrific condition, despite being adopted (Exhibit 4); in part because the experience desired by the volunteers is inconsistent with Best Management Practices

Commenter 389

**Response:** Thank you for your comment. In the implementation strategy in Chapter 2 of the FEIS, we identify that a volunteer strategy will be developed in order to utilize volunteers to successfully implement the decision. It is also necessary to understand that not all needs of the Forest can be met with only volunteer help. It is the responsibility of the Forest Service to work closely with our volunteers to establish realistic expectations and to ensure that our management needs are being met.

3. Kyburz Krawlerz would be willing to adopt 09N20, 09N12 and spurs, dispersed campsite off Silverfork Road just past mile marker 11

Commenter 439

**Response:** Thank you for your comment. The implementation strategy outlined in Chapter 2 of the FEIS identifies a public volunteer strategy be developed within six months of the final decision. Identifying volunteer opportunities is a critical aspect of implementing the final decision so the ENF expects to work with volunteers whenever appropriate.

4. I respectfully request that you either hand over maintenance of the trail system to an OHV association or abandon these restrictive measures. The more land you close the more you encourage illegal riding.

Commenter 28

Response: The Travel Management Rule provides a set of evaluation criteria for designating roads and trails and considering the availability of resources to maintain the system is a criterion. A number of other criteria also need to be taken into account, including the consideration of the effects of route designation on National Forest System natural and cultural resources, public safety, provision of recreational opportunities, access needs, and conflicts among uses of National Forest System lands The decision whether to allow or not

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- allow public use on roads and trails is not based solely on maintenance ability. All of the alternatives analyzed in the FEIS maintain a significant number of miles of roads and trails open to motor vehicle use. Alternative B was modified between the DEIS and FEIS. Modified B provides a high level of access, while still minimizing impacts to certain resources. An effort was made in this alternative to provide a range of public wheeled motor vehicle access to various recreation opportunities.
- 5. I don't see any real or clear reason why this closure should be enacted. These trails are primarily maintained by private OHV clubs that have a concern and love for the beauty of the area. The Forest Service should look at the OHV users of these lands as guardians or an extra set of eyes. Furthermore, the OHV backyard is continually getting smaller because of the small, highly vocal, environmentalist groups.

Commenter 35, 769

- Response: Please refer to page 1-5 of the FEIS for the reasons for this federal action. There is resource damage occurring from the use of wheeled motorized vehicles using unauthorized routes or cross country travel. Unmanaged public wheeled motorized vehicle travel has caused increased conflict between motorized and non-motorized uses; complaints about noise, trespass, dust and vandalism from adjacent property owners; and areas of degraded soil, water, vegetation, wildlife and cultural resources. The routes covered by this analysis include both roads and trails. There is a need for regulation of unmanaged public wheeled motorized vehicle travel. The Travel Management Rule, 36 CFR Part 212, provides policy for ending this trend of unauthorized route proliferation and managing the Forest transportation system in a sustainable manner through designation of motorized National Forest System roads and trails and the prohibition of cross-country travel.
- There are three additional needs to meet with this action. There is a need to comply with the United States District Court for the Eastern District of California final order (Case Civ-S-02-0325 Lkk/Jfm, August 16, 2005, Senior Judge Lawrence K. Karlton). There is a need for limited changes to the system of Eldorado National Forest System roads and trails to provide public wheeled motorized vehicle access to dispersed recreation opportunities (e.g. camping, hunting, fishing, hiking, horseback riding); provide a diversity of public wheeled motorized vehicle recreation opportunities (e.g. 4 wheel drive vehicles, ATVs, motorcycles, passenger cars); and provide routes that create loops and thru routes to enhance public wheeled motor vehicle recreational opportunities. Additionally, there is a need to comply with the Eldorado National Forest Land and Resource Management Plan as amended and the National Travel Management Rule of 2005.
- 6. I am writing to express my support for continue access to the off road vehicle trails within the Eldorado National Forest. I have long felt that there is a significant disconnect between the cumulative total of the funds collected from the OHV community, through registration fees and the quantity and quality of riding areas available. The funds should be made available to provide for the managed staging areas, trails and a set of sensible and enforced rules. However, the DEIS presents no alternative with this goal in mind. The only alternative that allows for continued use of these public lands is the no action alternative. I support development of the following. Development of an alternative that allows for increased trail system miles. Increase trail safety through decreased rider density. Develop and enforce reasonable regulations that enhance stewardship of the environment by the riders. Invoke a Fee system along with both environmental and general trail safety at most riding areas. Provide better staging and camping areas focused around ORV activities.

Commenter 38

Response: Thank you for your comments. The Eldorado National Forest has applied for and received many cooperative agreements for operation and maintenance of the OHV opportunities and more recently cooperative agreements for enforcement, facilities operation and maintenance, restoration and trail maintenance from the California Off-Highway Vehicle Motorized Recreation Grants Program. The State OHV Grants Program is funded largely through state fuel taxes with a component coming from OHV registration fees. The Forest Service along with the Bureau of Land Management and other local agencies apply for funding through a competitive grants process. The State has set up categories of projects that include acquisition, conservation, development, facilities operation and maintenance, law enforcement, OHV safety and education, planning, restoration and trail maintenance.

- This project is to establish the "backbone" of a travel management system, consistent with the national Travel Management regulations and the requirements of a recent Federal Court order. In an effort to keep the scope of the project manageable and to be able to comply with the Court mandated timeline, the Forest Supervisor at the start of the project, decided that construction of new routes would be outside the scope of this project. The national Travel Management regulations at 36 CFR 212.54 provide for revision of designations as needed to meet changing conditions, including the potential to add new routes following public involvement and site specific environmental analysis.
- The Forest Service has considered a fee system for specialized activities like OHV recreation, but a this time consideration is still preliminary. Additional public involvement and planning are needed to develop the fee system.
- Providing better staging and camping areas for OHV activities is outside the scope of this project. Each District Ranger will decide on whether to start a separate environmental analysis for making improvements to the staging and camping areas adjacent to OHV opportunities.
- 7. It is in the best interest of the public to allow continued mixed uses (mechanized and non-mechanized travel) of our national forests. There is a large group of responsible OHV enthusiasts and/or OHV clubs that would embrace assisting with trail maintenance through work days or "trail adoption".

Commenter 55, 826

- **Response:** Thank you for your comment. The implementation strategy outlined in Chapter 2 of the FEIS identifies a public volunteer strategy be developed within six months of the final decision. Identifying volunteer opportunities is a critical aspect of implementing the final decision so the ENF expects to work with volunteers whenever appropriate.
- 8. The most astounding revelation was the 600% growth in the off Highway Vehicles (OHV) in the past 30 years, and 15 times increase in size in the past 16 years. Assuming that trend will continue, the proposed closure of existing trails will have the effect of putting more vehicles on less trails, which would seem in direct conflict with your stated goal ".....to find ways to provide quality motorized opportunities while minimizing user conflicts and protecting forest resources." The answer, in my opinion, is to provide more designated trails, but properly managed and maintained. To that end, I have a suggestion. I was recently invited to join the Friends of the Rubicon (FOTR) for a day on a trail, where I observed about 150 people building blockades for closed trails, and improving and maintaining the existing trail. I think, starting with the FOTR, you will find an army of people who would volunteer to be "Friends of the Forest", to help develop, maintain and police the forest as an assist to own staff. In that manner, the primary stakeholders, those who frequent the forest, can play an active role in protecting and enhancing what rightly belongs to all taxpaying citizens. While limiting cross country access is a federal directive, building and maintaining more designated trails to key

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locations with volunteer help could increase the access and limit any detrimental environmental impacts.

#### Commenter 43

- **Response:** Thank you for your comment. The implementation strategy outlined in Chapter 2 of the FEIS identifies a public volunteer strategy be developed within six months of the final decision. Identifying volunteer opportunities is a critical aspect of implementing the final decision so the ENF expects to work with volunteers whenever appropriate.
- 9. There was a significant amount of talk about the lack of funding available to keep the trails maintained. Volunteer groups have been effective in getting the work done and as a whole the trails and their design have been doing a pretty good job of maintaining themselves over the past years without the intervention that Forest Service feels is necessary.

#### Commenter 61

- Response: Thank you for your comment. As stated in the preamble to the national Travel Management Rule, the Forest Supervisor should consider the contributions from volunteers and other cooperators in deciding on which routes to allow public wheeled motor vehicle use. However, the evaluation criteria in the Travel Management Rule also require the Forest Supervisor to consider the effects of route designation on the need for maintenance and administration of roads, trails, and areas that would arise if the public wheeled motor vehicle use is allowed; and the availability of resources for that maintenance and administration.
- 10. Compare the percentage growth in regional population to the growth of camping facilities in your area of supervision over the last 25 to 35 years. The USFS must devise a system of guiding and empowering interested nonprofit groups to develop and maintain trailhead parking, camp grounds (primitive and improved) as well as access roads to meet the public demand for recreation. Within certain limitations, logging can pay for road building and clearing activities. OHV and XC ski groups are anxious to help sign and even "police" the areas and routes. Boy Scout troops are another resource with willing labor and talent.

#### Commenter 150

- Response: Thank you for your comment. The growth of camping facilities is outside of the scope of this project. As part of the Implementation Strategy in Chapter 2 of the FEIS, the Forest Service will begin working with a collaborative group of stakeholders (which would include nonprofit groups) to develop a public volunteer strategy to identify opportunities for the public to help implement, enforce, maintain and fund the designated route system. This collaborative group of stakeholders would also help develop a strategy for designating areas for public wheeled motor vehicle use of dispersed camping areas. Your suggestion for nonprofit groups to develop and maintain trailhead parking and campgrounds (primitive and improved) would be an important part of implementation.
- The continued use for recreation of roads and clearings created for logging would have to part of the proposed action or alternatives in the original environmental analysis for the forest management project or in a separate environmental analysis for recreation use.
- 11. There has been very little if anything said about the use of volunteers to help with maintenance like done at Rock Creek OHV area. Implementing volunteer programs like the one used at Rock Creek at each of the four ranger districts, promoting the Adopt-A-Trail program, and utilizing other volunteer resources are viable ways to maintain an extensive route system, and are ideas that should get more consideration when developing reasonable alternatives.

Commenter 152, 704, 177

Response: Thank you for your comment. As stated in the preamble to the national Travel Management Rule, the Forest Supervisor should consider the contributions from volunteers and other cooperators in deciding on which routes to allow public wheeled motor vehicle use. Therefore, Chapter 2 of the FEIS contains an implementation strategy that includes elements to develop a strategy which among other tasks, will work to discuss how the public can help with implementation and maintenance of the designated system, enforcement of the rules, and education of other forest users.

12. Hopeful that the forest service adequately takes into account the very significant recent efforts by the off-road community and supporting organizations to become real partners with ENF in maintaining, conserving, preserving, and policing these extraordinary trails for the public.

Commenter 8, 730, 766

Response: As stated in the preamble to the national Travel Management regulations (Fed Reg, V 70, No. 216, p 68281), the Forest Supervisor should consider the contributions from volunteers and other cooperators in deciding on which routes to allow public wheeled motor vehicle use. However, the Forest Supervisor must also consider resource impacts and the need for resource protection as well as public safety. The implementation strategy in Chapter 2 of the FEIS includes elements to develop a strategy which among other tasks, will work to discuss how the public can help with implementation and maintenance of the designated system, enforcement of the rules, and education of other forest users.

13. Look to volunteers as a resource to keep trails open.

Commenter 314, 818

Response: As stated in the preamble to the national Travel Management Rule, the Forest Supervisor should consider the contributions from volunteers and other cooperators in deciding on which routes to allow public wheeled motor vehicle use. Therefore, Chapter 2 of the FEIS contains an implementation strategy that includes elements to develop a strategy which among other tasks, will work to discuss how the public can help with implementation and maintenance of the designated system, enforcement of the rules, and education of other forest users.

14. The USFS should require the OHV Coordinator to organize volunteers to maintain the trails and keep them multiple use.

Commenter 352

**Response:** Thank you for your comment. Chapter 2 of the FEIS contains an implementation strategy that includes elements to develop a strategy which among other tasks, will work to discuss how the public can help with implementation and maintenance of the designated system, enforcement of the rules, and education of other forest users.

15. Interested in volunteering in the Bald Mountain area.

Commenter 354

**Response:** Thank you for your comment. The implementation strategy outlined in Chapter 2 of the FEIS identifies a public volunteer strategy be developed within six months of the final decision. Identifying volunteer opportunities is a critical aspect of implementing the final decision so the ENF expects to work with volunteers whenever appropriate.

16. FS fails to consider the efforts of volunteers in the analysis of alternatives.

Commenter 443, 705

**Response:** Thank you for your comment.

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17. The OHV user base has dedicated many hours effort to trail maintenance. The current plans shut OHV users out of trails that they have worked on for years. The OHV community would gladly step up there efforts to address any issues of trail maintenance.

Commenter 23, 356, 631, 660, 746, 777

- Response: Thank you for your comment. We appreciate the hard work, dedication, and passion that all volunteers on the ENF put in to their respective causes. The Implementation Strategy in Chapter 2 of the FEIS outlines a strategy for working with volunteers to implement and maintain the system. However, the national Travel Management Rule and the District Court Order require the Forest Supervisor to consider the impact of designating roads and trails on NFS natural and cultural resources, the need for maintenance and administration of designated roads, trails, and the availability of resources for that maintenance and administration.
- 18. Let the off road clubs continue to maintain the trails. The rangers could still patrol the trails and make notes of what repairs need attention. Then forward the notes to the club that has adopted that trail. This works pretty good with the "adopt a highway" program used for trash pick up on our highways. Why not use the same for our OHV areas as well?

Commenter 24, 707

- **Response:** As described in the "Implementation Strategy" section of Chapter 2 of the FEIS, the Forest intends to continue to work with interested volunteers on trail maintenance, signing, and information-sharing projects, and will work with partners to pursue grants and other funding sources to implement needed projects.
- 19. Though I volunteer many hours and made this point in several EIS meetings, there is no mention of OHV Volunteers and our work to maintain trails.

Commenter 53

- **Response:** Thank you for your comment. We appreciate the hard work, dedication, and passion that all volunteers on the ENF put in to their respective causes. The Implementation Strategy in Chapter 2 of the FEIS outlines a strategy for working with volunteers on trail maintenance, signing, and public education projects.
- 20. I have emailed Forest Service Personnel about volunteering, seeing what I can do to help but I have never gotten a reply! I am a manager for a large automotive dealership. I would like to think I am responsible and could be of some help to you.

Commenter 57

- **Response:** Thank you for your comment. The implementation strategy outlined in Chapter 2 of the FEIS identifies a public volunteer strategy be developed within six months of the final decision. Identifying volunteer opportunities is a critical aspect of implementing the final decision so the ENF plans to work with volunteers whenever appropriate.
- 21. The argument of not having the funding to maintain the trails does not hold up especially when the very active volunteer is ready to help. A serious reduction in trails will only deplete the number of enthusiastic supporters that are willing to come out and do trail work, therefore make the dollar per mile become more expensive with a smaller trail mile network.

Commenter 61, 439

**Response:** Thank you for your comment.

22. I am very willing to do my part to support trail maintenance either through my own personal investments in time or finances. If we could find out more about the problems the Forest Service is trying to fix, then we (the OHV riding community) will work collaboratively with you to help correct the issues and preserve a way of life for our future generations.

#### Commenter 69

**Response:** Thank you for your comment. The implementation strategy outlined in Chapter 2 of the FEIS identifies a public volunteer strategy be developed within six months of the final decision. We plan on working collaboratively with stakeholders to develop a sustainable volunteer program to help with trail maintenance, monitoring, and public education.

- 23. Use volunteers to help maintain routes and mitigate resource damage.
- Commenter 8, 93, 94, 111, 130, 142, 177, 231, 288, 390, 401, 414, 424, 437, 462, 466, 565, 620, 637, 648
- **Response:** Thank you for your comment. Currently, the ENF works with a number of volunteers who, among other things, work on maintaining the trail system. The implementation strategy outlined in Chapter 2 of the FEIS identifies a Travel Management specific volunteer strategy be developed within six months of the final decision. We plan on working collaboratively with stakeholders to develop a sustainable volunteer program to help with trail maintenance, monitoring, and public education.
- 24. I realize there are costs; however, those costs are far LESS than if the FS were to contract with a company to perform the same services the volunteers perform for FREE. Volunteers have worked and continue to work thousands of hours each year maintaining trails and campgrounds in the ENF. This fact should not be overlooked or disregarded when making your decision on an alternative route.

#### Commenter 80

- Response: As stated in the preamble to the national Travel Management regulations (Fed Reg, V 70, No. 216, p 68281), the Forest Supervisor should consider the contributions from volunteers and other cooperators in deciding on which routes to allow public wheeled motor vehicle use. However, the Forest Supervisor must also consider resource impacts and the need for resource protection as well as public safety. The implementation strategy in Chapter 2 of the FEIS includes elements to develop a strategy which among other tasks, will work to discuss how the public can help with implementation and maintenance of the designated system, enforcement of the rules, and education of other forest users.
- 25. I also heard USFS employees say at a meeting that they cannot manage the miles they have and that is also disappointing. I feel the excuses are plentiful as there are many ways to manage trails and depending on use and access, many off-road volunteers are willing to provide service hours to maintain trails.

#### Commenter 167

- **Response:** We understand that working with volunteers will be essential for successful implementation of the decision. Therefore, the implementation strategy in Chapter 2 of the FEIS includes elements to develop a strategy which among other tasks, will work to discuss how the public can help with implementation and maintenance of the designated system, enforcement of the rules, and education of other forest users.
- 26. Plan A would be a good start. I feel the best alternative would be to keep the routes open as they are, and with the help of volunteer groups starting with the FOTR, you will find an army of people who would volunteer to be "Friends of the Forest", to help develop, maintain and police the forest. Building and maintaining more designated trails to key locations with volunteer help could increase the access and limit any detrimental environmental impacts.

#### Commenter 177

**Response:** Thank you for your comment. In an effort to keep the scope of the project manageable and to be able to comply with the Court mandated timeline, the Forest Supervisor decided at the start of the project that construction of new routes would be outside the scope of this

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- project. The national Travel Management regulations at 36 CFR 212.54 provide for revision of designations as needed to meet changing conditions, including the potential to add new routes following public involvement and site specific environmental analysis.
- 27. Purposing that the FS halt the action and continue to look for more appropriate methods to improve our use of the forest w/OHV, by asking for more help from M.C. clubs, OHV clubs, and the general public.

#### Commenter 184

- Response: Thank you for your comment. The ENF is complying with the Travel Management Rule (36CFR212, 251, 261,295) by banning cross country travel and designating routes for public wheeled motor vehicle use. We are also under a court order to release a decision on the project by April 2, 2008. At the same time, we understand that working with volunteers will be essential for successful implementation of the decision. Therefore, the implementation strategy in Chapter 2 of the FEIS includes elements to develop a strategy which among other tasks, will work to discuss how the public can help with implementation and maintenance of the designated system, enforcement of the rules, and education of other forest users.
- 28. I find it disheartening to hear the FS talk so much about budgetary concerns when over the years the FS has shown they haven't spent that much on trail maintenance. The trails I rode as a kid are just as tough, and in the same relative shape as they are now. One other maintenance project that I've seen in my lifetime and that was a culvert pipe put across the 4WD trail (17E24) going to Mud Lake in the mid 80's. A common sense, collaborative approach can be implemented using an adopt-a-trail program for all high sierra trails.

#### Commenter 1

- **Response:** Thank you for you comment. The implementation strategy outlined in Chapter 2 of the FEIS identifies a public volunteer strategy be developed within six months of the final decision. We plan on working collaboratively with stakeholders to develop a sustainable volunteer program to help with trail maintenance, monitoring, and public education.
- 29. Consider funding volunteer programs to perform trail maintenance. Another alternative would be to collect funds directly via paid permits for trail use.

#### Commenter 196

- **Response:** Thank you for your comment. The Forest Supervisor has maintained that he is not interested in implementing a permit system to manage public wheeled motor vehicle use on the ENF. The implementation strategy outlined in Chapter 2 of the FEIS identifies a public volunteer strategy be developed within six months of the final decision. Identifying volunteer opportunities is a critical aspect of implementing the final decision so the ENF plans to work with volunteers on trail maintenance, signing, and public education projects.
- 30. Families that play together make for the best stewards to our public lands now and in the future. Keeping thee trails open is the most important thing you can do to teach our children how to respect the forest.

#### Commenter 186

- **Response:** Thank you for your comment. In response to public comments on the DEIS, Alternative B was modified to provide a higher level of access than Alternative D, which was the preferred alternative identified in the DEIS, while still minimizing impacts to certain resources.
- 31. 09N83 is a through route from Hwy 88 to Hwy 4. This route has been adopted by the South County Trail Riders

Commenter 316, 461, 601, 631, 864, 891

Response: Thank you for your comment.

32. part of many clean-up runs; belong to groups who volunteer to do trail repairs and maintenance; there are so many groups that will keep the trails cleaned and maintained; we are as a community willing to volunteer more of our time- the man power we have

Commenter 93, 111, 140, 379, 390, 466

**Response:** Thank you for your comment. The implementation strategy outlined in Chapter 2 of the FEIS identifies a public volunteer strategy be developed within six months of the final decision. Identifying volunteer opportunities is a critical aspect of implementing the final decision so the ENF plans to work with volunteers on trail maintenance, signing, and public education projects.

33. I am a board member of the Rubicon Trail Foundation, member of the Pirates of the Rubicon, and am a volunteer member of the FOTR. I have personally spent many hours on several volunteer project to benefit the Rubicon Trail

Commenter 973

Response: Thank you for your comment.

34. Consider letting people who frequent the forest the most to volunteer to manage and maintain our forest.

Commenter 1019

**Response:** The implementation strategy in Chapter 2 of the FEIS includes elements to develop a volunteer strategy within six months of the final decision. This strategy will, among other tasks, work to discuss how the public can help with implementation and maintenance of the designated system, enforcement of the rules, and education of other forest users.

35. Does not address how to utilize volunteer effort to help maintain the system.

Commenter 1028

**Response:** Thank you for your comment. The implementation strategy in Chapter 2 of the FEIS includes elements to develop a volunteer strategy within six months of the final decision. This strategy will, among other tasks, work to discuss how the public can help with implementation and maintenance of the designated system, enforcement of the rules, and education of other forest users.

36. Volunteers who care about a specific resource are more than capable of maintaining that resource.

Commenter 1052

Response: Thank you for your comment.

37. Volunteers cannot maintain the thousands of miles of roads on the Forest. Many are untrained and have limited availability; to maintain these roads properly, the needs is not only people who are experienced and trained, but need certified, licensed operators on heavy equipment such as dump trucks, road graders, backhoes, rollers and others

Commenter 361

**Response:** Thank you for your comment.

38. 14N09A adopted by the Capitol City Mountain Goats

Commenter 379

Response: Thank you for your comment.

39. Weaknesses of the alternatives: default closures and not better use of maintenance of existing routes, and not including users in the maintenance/repair/management of routes.

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## Commenter 358

Response: Thank you for your comment. In Appendix F of the FEIS, the rationale for not allowing public wheeled motor vehicle use on a ML-2 road in Modified B, the Preferred Alternative, is listed. Also, Appendix G shows the rationale for considering allowing use on ML-1 roads. The implementation strategy in Chapter 2 of the FEIS includes elements to develop a volunteer strategy within six months of the final decision. This strategy will, among other tasks, work to discuss how the public can help with implementation and maintenance of the designated system, enforcement of the rules, and education of other forest users.

40. I would recommend working together to support a good cause

Commenter 293

Response: Thank you for your comment.

41. Many people come from the city and do not know the ways of the backcountry- use volunteer speakers to get information out to service organizations, school groups, and other outdoor places; would like to see FS personnel mingling with the public and educating them on Forest practices instead of going out after a busy weekend to see any 'OHV damage'

Commenter 369, 380

- **Response:** Thank you for your comment. The implementation strategy in Chapter 2 of the FEIS includes elements to develop a volunteer strategy within six months of the final decision. This strategy will, among other tasks, work to discuss how the public can help with implementation and maintenance of the designated system, enforcement of the rules, and education of other forest users.
- 42. Allow groups to adopt an area to maintain and educate the public about the rules and regulations.

Commenter 1011

- **Response:** The implementation strategy in Chapter 2 of the FEIS includes elements to develop a volunteer strategy within six months of the final decision. This strategy will, among other tasks, work to discuss how the public can help with implementation and maintenance of the designated system, enforcement of the rules, and education of other forest users.
- 43. I would like to be one to assist the FS with the implementation of the plan.

Commenter 1

**Response:** Your name has been added to a list of individuals interested in helping with the implementation strategy.

## **Access (Concentrated Use)**

- 1. A large number of commenters expressed their concern that, as motorized recreation is increasing in popularity, the Travel Management decision will force a growing number of motorized recreationists onto less roads and trails in the Forest. This will result in adverse impacts to the Forest including: overcrowding increased resource damage, a higher number of accidents, a need for increased maintenance, and an increase in off trial riding.
- Commenter 1, 13, 27, 40, 61, 63, 68, 69, 70, 84, 87, 91, 111, 136, 141, 142, 152, 153, 167, 171, 176, 177, 184, 186, 197, 199, 211, 212, 230, 262, 312, 314, 315, 358, 360, 374, 379, 380, 400, 414, 439, 455, 461, 480, 624, 636, 637, 639, 682, 711, 722, 755, 766, 771, 800, 823, 881, 893, 1002, 1014, 1017, 1021, 1038, 1079
- **Response:** This project is to establish the "backbone" of a travel management system, consistent with the national Travel Management regulations and the requirements of a recent Federal Court order. In an effort to keep the scope of the project manageable and to be able to

comply with the Court mandated timeline, the Forest Supervisor decided at the start of the project that construction of new routes would be outside the scope of this project. The Implementation Strategy presented in Chapter 2 of the FEIS includes an element, whereby the ENF will work with a collaborative group of public stakeholders to develop a process for considering the addition of routes or changes in management of the designated system. This strategy is consistent with the national Travel Management regulations at 36 CFR 212.54, which provide for revision of designations as needed to meet changing conditions, including the potential to add new routes following public involvement and site specific environmental analysis.

2. There is a reason there are so many trails in the mountains. They need to be there to handle the load and they each have a unique and specific purpose. These trails would not have survived or continued to be used if there was not a need for them. A lot of trails have actually been used, gone unused, then reopened on an unstructured "rotational" basis. There is no contingent in the proposal for anything like this though it has been a sound management plan in place by Mother Nature and responsible users.

Commenter 61

Response: Thank you for your comment.

3. FS does not need to meet all the demand for motorized routes that now exist

Commenter 860, 861

Response: Thank you for your comment.

4. The overcrowding by the growing off-road community will be even worse and very nice dispersed camping will be even harder to find.

Commenter 1064

**Response:** Thank you for your comment.

5. Seasonal trail closures will put more pressure on the limited and declining amount of other OHV areas, and increase accidents.

Commenter 1030, 1065

**Response:** The seasonal closures proposed in each action alternative are considered consistent with Forest Standards and Guidelines. In Modified B, the seasonal closure is for the primary period when past experience has shown that the native surface roads and trails are most susceptible to damage from wheeled vehicle use. The rationale behind the seasonal closure is presented in Appendix xx of the FEIS.

6. The statement in the NOI to "minimize conflict" is not addressed in DEIS since the result of Travel Management will be concentrated use. At a meeting, FS was not able to answer who the conflicts were between.

Commenter 439, 667, 680, 893

**Response:** Thank you for your comment. The Travel Management Rule requires that the Forest Supervisor consider the effects of designating roads and trails on, among other things, conflicts among uses of NFS lands.

7. Trails are public rights of way which have been used historically by millions of Americans. Do not take away my right-of-way; closing rights of way to the public in our national forests is a short sited management plan.

Commenter 142, 148, 149, 334, 379, 620

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**Response:** Thank you for your comment. NFS roads or trails that cross private land for which a public right of way exists may be designated for public wheeled motor vehicle use. The Forest LRMP Standard and Guideline directs that:

Roads and trails for which required rights-of-way do not exist and those located predominantly on private land will not be designated for OHV uses, however, a list will be developed of priority ROW acquisitions needed to complete the desired road and trail system. (ENF LRMP. Forestwide S&G 27)

8. Keep the roads and trails open, there are plenty of responsible people out there that enjoy them responsibly!

Commenter 2, 304, 1077, 1081, 1082, 1085, 1088, 1089, 1091, 1101, 1104, 1105, 1106, 1107, 1110, 1112

Response: Thank you for your comment.

9. I have enjoyed using the OHV trails on the ENF for many years and would like to continue to take my family there. I appreciate the forest efforts to allow recreation in this area. I hope that we can continue to enjoy our NF.

Commenter 4,

**Response:** Thank you for your comment. We also hope that you will continue to enjoy the Eldorado National Forest.

10. Do not support the closure of additional roads and trails by the FS.

Commenter 18, 39, 66, 71, 166, 169, 204, 436

Response: Thank you for your comment.

11. Please do not restrict the use of public land.

Commenter 10, 34, 54, 91, 185, 189, 190, 225, 227, 238, 241, 1022

Response: Thank you for your comment.

12. Support continued open riding of ATV's and motorcycles on the ENF.

Commenter 8, 78, 90, 93, 94, 95, 98, 102, 105, 106, 112, 115, 120, 122, 123, 124, 125, 126, 127, 129, 133, 134, 136, 140, 141, 142, 144, 145, 146, 147, 148, 149, 235, 260, 263, 266, 269, 270, 273, 274, 276, 282, 285, 288, 289, 293, 296, 297, 298, 299, 300, 339, 390, 391, 392, 393, 394, 395, 396, 404, 406, 408, 420, 424, 430, 431, 433, 435, 448, 449, 451, 452, 453, 454, 455, 456, 460, 466, 467, 468, 470, 475, 478, 479, 480, 485, 507, 533, 534, 535, 536, 592, 610, 620, 625, 633, 636, 637, 638, 648, 772, 1033

Response: Thank you for your comment.

13. Public land belongs to the people so do not deny us access.

Commenter 168, 190, 219, 1063

Response: Thank you for your comment.

14. Please do not close anymore trails, roads, pull-outs, campgrounds, so families can continue to enjoy them. We value the ENF as an off-road haven.

Commenter 26, 30, 31, 77, 94, 95, 98, 102, 109, 115, 120, 122, 123, 124, 125, 126, 127, 129, 133, 134, 135, 138, 140, 141, 142, 144, 147, 149, 188, 190, 219, 261, 263, 266, 269, 270, 273, 274, 276, 279, 282, 285, 288, 296, 297, 300, 390, 392, 393, 395, 440, 443, 441, 444, 447, 448, 451, 625, 626, 1066, 1073

**Response:** This project is to establish the "backbone" of a travel management system, consistent with the national Travel Management regulations and the requirements of a recent Federal Court order. The national Travel Management regulations at 36 CFR 212.54 provide for

revision of designations as needed to meet changing conditions, including the potential to add new routes following public involvement and site specific environmental analysis.

15. I have lived in El Dorado County since I was 9 years old and have slowly seen our forest shut down to travel since I was a kid.

Commenter 29

Response: Thank you for your comment.

16. Closing access to OHV areas means many people will never see anything past the side of a paved highway. Most people who utilize these off road areas have a great respect for nature and enjoy the chance to escape our concrete lined worked. Limiting access to these areas is a huge step in the wrong direction.

Commenter 32

**Response:** Thank you for your comment. Modified B, the preferred alternative, was modified in response to public comments on the DEIS. It was intended, in part, to provide a high level of motorized recreation opportunities and access across the forest. As is shown in Table xx in Chapter 2 of the FEIS, the preferred alternative allows public wheeled motor vehicle use on 1009 miles of native surface roads and 213 miles of trails.

17. As a taxpayer I am shocked you are trying to close down forest land which has been used for many years by OHV enthusiasts. This area is used by many families for recreation.

Commenter 48

Response: Thank you for your comment.

18. THERE'S NO NEED TO CLOSE ANYTHING. Seasonal closures are just as unjust.

Commenter 50

**Response:** The seasonal closures proposed in each action alternative are considered consistent with Forest Standards and Guidelines. In Modified B, the seasonal closure is for the primary period when past experience has shown that the native surface roads and trails are most susceptible to damage from wheeled vehicle use. The rationale behind the seasonal closure is presented in Appendix xx of the FEIS.

19. I strongly object to the proposed obliteration of existing OHV trails in the El Dorado National Forest. The trails that are now in use and have been in use for many years are well established and offer some of the best OHV use opportunities anywhere. Closing long establish existing trails is completely unacceptable!

Commenter 59

**Response:** This project is to establish the "backbone" of a travel management system, consistent with the national Travel Management regulations and the requirements of a recent Federal Court order. The national Travel Management regulations at 36 CFR 212.54 provide for revision of designations as needed to meet changing conditions, including the potential to add new routes following public involvement and site specific environmental analysis.

20. Closing the trails during our prime riding season is an insult! Our club, Trail bike Sportsmen Association are the most responsible group of folks I have ever met and we are all saddened and VERY worried. We all believe the closure of any trail is unnecessary with so many other alternatives available.

Commenter 63

**Response:** The seasonal closures proposed in each action alternative are considered consistent with Forest Standards and Guidelines. In Modified B, the seasonal closure is for the primary period when past experience has shown that the native surface roads and trails are most

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- susceptible to damage from wheeled vehicle use. The rationale behind the seasonal closure is presented in Appendix xx of the FEIS.
- 21. Closing the routes is UNAMERICAN. We cannot be denied the land in which we grow. We cannot be withheld from National Forest Land, land which is for the use of the general public.

Commenter 67

Response: Thank you for your comment.

22. The DEIS as written is completely unacceptable to me, closing off more and more land is not the answer; I sincerely hope you do not close the many great places I have been.

Commenter 87

- **Response:** Thank you for your comment. Modified B, the preferred alternative, was modified in response to public comments on the DEIS. It was intended, in part, to provide a high level of motorized recreation opportunities and access across the forest. As is shown in Table xx in Chapter 2 of the FEIS, the preferred alternative allows public wheeled motor vehicle use on 1009 miles of native surface roads and 213 miles of trails.
- 23. You should be opening up USFS lands for timber harvest and recreation, not closing roads. Stop it. Closing another 1000 miles of USFS roads would be a travesty, piled on earlier travesties. These roads are our roads not yours to eliminate!

Commenter 88

**Response:** Thank you for your comment.

24. OHV use is a legitimate recreational activity that has a serious need for trail opportunity right now. Closing off any more areas or trails will only negatively impact the forest and the job of the Forest Service of doing its job.

Commenter 61

- **Response:** Thank you for your comment. We agree that OHV use is a legitimate recreational opportunity. In response to public comments, we modified Alternative B to provide increased access to the Forest, for all vehicles, and to protect certain Forest resources. Modified B allows OHV use on 213 miles of trails and 919 miles of roads.
- 25. I would like to express my displeasure in the idea of your preferred option to what is now accessible for public use. It's a shame that a few groups of people can dictate to the many what they can/can't go and do. I do not want to see any closures from what now exists but I do understand that some user made roads should be closed. We as tax payers have the right to use our forest and the roads we have paid for time and time again.

Commenter 15

- **Response:** Thank you for your comment. Modified B, the preferred alternative, was modified in response to public comments on the DEIS. It was intended, in part, to provide a high level of motorized recreation opportunities and access across the forest. As is shown in Table xx in Chapter 2 of the FEIS, the preferred alternative allows public wheeled motor vehicle use on 1009 miles of native surface roads and 213 miles of trails.
- 26. I wish to let you know my utter dismay and disappointment in what you are trying to do to our forest and the recreation my family enjoys all year long. It is decisions like this that make people angry and want to move from CA. I think your plan stinks. If you succeed with your plan you will ruin life for those of us that live in CA who enjoy nature and the fun that comes with camping, boating, fishing and hunting. All of these things that we willingly pay to do.

Commenter 17, 304

Response: Thank you for your comment.

27. Retrieve big game within 400 feet of roads and trails with vehicle.

Commenter 153

**Response:** The ENF is considered to be a heavily roaded forest, providing ample opportunity to retrieve game without traveling cross-country. Therefore, designating areas for cross-country travel for big game retrieval was not identified as part of the purpose and need for this project and is outside the scope of this project.

28. Limited off-route travel for retrieval of legally harvested big game animals is not considered.

Commenter 353, 360

**Response:** The ENF is considered to be a heavily roaded forest, providing ample opportunity to retrieve game without traveling cross-country. Therefore, designating areas for cross-country travel for big game retrieval was not identified as part of the purpose and need for this project and is outside the scope of this project.

29. Thank you for protecting the public natural resources that belong to all Americans, including future generations. And thank you for not sacrificing those resources to short-term damaging use by OHV's. Hundreds of miles of roads and trails will still be available for OHV use under Alternative D, and the fact that OHV riding in the ENF will no longer amount to a damaging free-for-all is a big step forward.

Commenter 19

Response: Thank you for your comment.

30. Favors largest reduction of ORV road mileage to ensure resource protection

Commenter 419

Response: Thank you for your comment.

31. Opposed to eliminating spur routes simply because they are dead ends.

Commenter 213, 436

**Response:** Thank you for your comment. Modified B, the preferred alternative, was modified in response to public comments on the DEIS. It was intended, in part, to provide a high level of motorized recreation opportunities and access across the forest. As is shown in Table xx in Chapter 2 of the FEIS, the preferred alternative allows public wheeled motor vehicle use on 1009 miles of native surface roads and 213 miles of trails.

32. The trend of closing dirt roads in the forest runs afoul of the multi-use mission of the USFS and denies a large and ever increasing populace access to public lands.

Commenter 150

Response: Thank you for your comment.

33. Want to know mitigation options in lieu of closing routes.

Commenter 1001

Response: Thank you for your comment.

34. The closure of road in the NF is an arbitrary decision based on prejudice against those who wish to enjoy the outdoors in a motorized vehicle. Any decision to close road can only lead to law suites by the ACLU and others. The time and resources of the FS could be better utilized by establishing the Back Country Discovery Routes such as those that cross Oregon from California to Washington

Commenter 204

Response: Thank you for your comment.

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35. I've definitely seen a lot more areas close than open. Speaking for a lot of people that enjoy our forests, rivers and lakes let's find an alternative to putting up green gates and red fiberglass no access signs.

Commenter 151

- **Response:** Thank you for your comment. Modified B, the preferred alternative, was modified in response to public comments on the DEIS. It was intended, in part, to provide a high level of motorized recreation opportunities and access across the forest. As is shown in Table xx in Chapter 2 of the FEIS, the preferred alternative allows public wheeled motor vehicle use on 1009 miles of native surface roads and 213 miles of trails.
- 36. I believe that the proposed changes in public land management are tragic. If anything is apparent, it is that the FS's lack of action over the past 20 years is why we have the huge problem we have today. Finger pointing at the user groups is not the answer. The National FS system must be able to adapt to the ever changing conditions, especially the increasing population and manage the forest at a level, which the public expects for the taxes and fees, we pay?

Commenter 154

- **Response:** This project is to establish the "backbone" of a travel management system, consistent with the national Travel Management regulations and the requirements of a recent Federal Court order. The national Travel Management regulations at 36 CFR 212.54 provide for revision of designations as needed to meet changing conditions, including the potential to
- 37. The FS must find a way to cost effectively manage the public lands that I and my family pay our taxes to be able to use. Closing many of the roads and trails to OHV use limits my ability to use public lands.

Commenter 184, 188

Response: Thank you for your comment.

38. Your plans on closing certain routes would deny us the freedom of use and exploring new routes to us.

Commenter 212

Response: Thank you for your comment.

39. I would like to see all existing trails and roads open in the NF system. If people want to go to an area where there is no vehicular traffic, CA has something like 1.9 million acres of wilderness set aside for just that purpose.

Commenter 217

Response: Thank you for your comment.

40. If the Federal Land Management is pressured to close the trails that are enjoyed by OHV enthusiasts, bird watchers, back packers, campers and day hikers we all lose. To generate interest in our environment one must be allowed to have access to these areas

Commenter 234

**Response:** Thank you for your comment.

41. I love access to all public lands. I want access to our lands.

Commenter 237

**Response:** Thank you for your comment.

42. Bring families together and keeps kids off the streets and out of trouble- no drugs in the woods; keeps kids busy and not on drugs

Commenter 452, 457

Response: Thank you for your comment.

43. Please preserve the ENF for ALL Californians, including future generations, rather than catering to a very small, very loud special interest (OHVers). This will help with the problems OHVs cause.

Commenter 1054

Response: Thank you for your comment.

44. Very important and appreciated "Route Specific Non-Significant Forest Plan Amendments". This practice must be preserved in these alternatives, and actually could be expanded.

Commenter 1, 152

Response: Thank you for your comment.

45. Closing more OHV trails from the public is just not an option. Our families use those trails to keep our kids away from drugs, gangs, violence and TV. Do not close those trails. Our kids need to experience our OHV family.

Commenter 46

Response: Thank you for your comment.

46. OHV is a rare sport that cuts across generational boundaries. I have been out with my father and my children; three generations having fun together.

Commenter 23

**Response:** Thank you for your comment.

47. Keep the trails open for future generations.

Commenter 1078

**Response:** Thank you for your comment.

48. The family recreation found on the following list of trails is far more important than any damages to "resources". Our families are our futures.

Commenter 186

**Response:** Thank you for your comment.

# Access ADA/Elderly/Medical

1. I am a 70 year old retired taxpayer who is unable to walk, hike, and hunt without vehicular access. The green gates that are springing up on every road that has not had rocks and berms added is getting to be a sea sight. I am against any road closure and do not want to see more paved roads with less access to the wilderness areas. It seems to me that poor management not "the public" is responsible for many of the fires and damage to our public lands. I like dirt road access without barriers for my outdoor experience.

Commenter 9

**Response:** Thank you for providing this information. This information was an important factor in the development of a new Alternative between the DEIS and FEIS. Modified Alternative B provides a higher level of access than Alternative D, which was the preferred alternative identified in the DEIS, while still minimizing impacts to certain resources.

2. As a senior citizen I strongly object to your purposed closure of roads that are currently in use and available to the taxpayers of our country. I have been hunting and fishing in these mountains all my life and this program would severely limit my ability to enjoy our forest.

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#### Commenter 41

Response: Thank you for providing this information. This Travel Management project is designed to reduce resource damage from motor vehicle use of inappropriate routes and cross country motor vehicle travel and redirect this use to sustainable NFS roads and trails. Alternative B was modified based on the information you and others provided between the DEIS and FEIS. Modified B provides a higher level of access than Alternative D, which was the preferred alternative identified in the DEIS, while still minimizing impacts to certain resources.

3. When motorized access is reduced, we can no longer take our children/grandchildren to enjoy the Forest. Also younger families cannot access those places with their young children.

Commenter 235, 304, 891

**Response:** Thank you for providing this information. This information was an important factor in the development of a new Alternative between the DEIS and FEIS. Modified B provides a higher level of access than Alternative D, which was the preferred alternative identified in the DEIS, while still minimizing impacts to certain resources.

4. Growing senior population requires more, not less spur roads to gain easy access to certain forest features such as preferred small streams for fishing. Some spur access roads may be 2-4 miles in length. (spur roads)

Commenter 339

Response: Thank you for providing this information. Alternative B was modified between the DEIS and FEIS based on comments like this and others. Modified B provides a higher level of access than Alternative D, which was the preferred alternative identified in the DEIS, while still minimizing impacts to meadows and certain sensitive wildlife habitat, and reducing impacts to stream courses and riparian habitat. An effort was made to provide a range of public wheeled motor vehicle access to various recreation opportunities.

5. Current policy changes will lead us to a single or limited use program; restrict access to the forest for the young, the elderly and the disabled; and result in a system that provides access to only a select few.

Commenter 64, 177, 334, 439, 443, 747

Response: Although the various alternatives considered in the FEIS include restrictions on where public wheeled motor vehicle use will be allowed, all of the alternatives maintain a significant number of miles of roads and trails open to motor vehicle use. A new Alternative was developed between the DEIS and FEIS which provides a high level of access, while still minimizing impacts to meadows and certain sensitive wildlife habitat, and reducing impacts to stream courses and riparian habitat. An effort was made in this alternative to provide a range of public wheeled motor vehicle access to various recreation opportunities.

6. Needs to be accessible for disabled people.

Commenter 169

Response: The Rehabilitation Act of 1973, which was amended by the Americans with Disabilities Act of 1990, set the direction that no person with a disability can be denied participation in a Federal program that is available to all other people solely because of their disability. This Travel Management project is designed to provide reasonable access for public wheeled motor vehicles and the decision to be made would apply to all Forest visitors. As stated in the preamble to the national Travel Management regulations, there is no requirement to allow people with disabilities to use motor vehicles on road or trails otherwise closed to motor vehicles since such an exemption could fundamentally change the travel management program (Fed Reg V.70, No. 216, p 68285).

7. The DEIS discriminates against persons with disabilities, such as myself, in violation of the Americans with Disabilities Act. Should USFS close or further restrict off-road trails, particularly single track trails, those existing recreational opportunities will be closed to persons with disabilities, like me. As I see it, your proposed project violates the intent of the Americans with Disabilities Act. The USFS proposed actions have the effect of further restricting the ability of disabled persons to enjoy our public lands, which belong to all of us, not just a few.

# Commenter 82

Response: The Rehabilitation Act of 1973, which was amended by the Americans with Disabilities Act of 1990, set the direction that no person with a disability can be denied participation in a Federal program that is available to all other people solely because of their disability. This Travel Management project is designed to provide reasonable access for public wheeled motor vehicles and the decision to be made would apply to all Forest visitors. As stated in the preamble to the national Travel Management regulations, there is no requirement to allow people with disabilities to use motor vehicles on road or trails otherwise closed to motor vehicles since such an exemption could fundamentally change the travel management program (Fed Reg V.70, No. 216, p 68285). The analysis of effects in Chapter 3, (Recreation and Socioeconomic sections) and Table 2-16 in Chapter 2 display the impacts of restricting public motor vehicle access, including access by people with disabilities, so that the Forest Supervisor can make an informed decision. The effects analysis does recognize that those alternatives with greater restrictions on public wheeled motor vehicle use of roads and trails impact persons with disabilities to a greater extent than those alternatives with fewer restrictions, particularly for those routes which provide access to recreation opportunities such as dispersed camping, streamside access, etc.

8. Closures restrict ADA access.

Commenter 92, 130, 142, 235, 275, 281, 288, 339, 398, 470, 471, 620, 633, 636, 648

Response: The decision to be made in this Travel Management project is to identify which roads or trails will allow public wheeled motor vehicle use. The determination of the specific type of closure method will be made at a later time. The analysis in the FEIS recognizes that access to certain routes will be restricted by this project, and that access will apply to all public wheeled motor vehicles. An exception is for the use of a wheelchair that meets the legal definition, which may be used wherever foot travel is permitted. A wheelchair is defined as a device designed solely for the use by a mobility impaired person for locomotion, which is suitable for use in an indoor pedestrian area (ADA Title V Section 507c and Forest Service Manual 2353.05)

9. From the 90s to now the forest is only accessible to me in a 4wd with my Blue Disability tag. Commenter 219, 221

Response: The Forest Service has been managing travel on the Eldorado National Forest since its inception. The Agency has constructed and maintained many roads and trails over the years, and has restricted use on some. This Travel Management project is an ongoing effort to manage public wheeled motor vehicle use of the National Forest and to implement the direction in the ENF LRMP and the national Travel Management regulations. The restrictions will apply to all public wheeled motor vehicles, except for the use of wheelchairs, as legally defined.

10. People, especially children and the elderly, rely on vehicles to get to nature areas. A vehicle is the only way to access public lands.

Commenter 336, 461, 663, 702, 726, 763, 814, 824, 834, 859, 864, 867

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- **Response:** Thank you for providing this information. This information was an important factor in the modifying Alternative B between the DEIS and FEIS. Modified B provides a higher level of access than Alternative D, which was the preferred alternative identified in the DEIS, while still minimizing impacts to certain resources.
- 11. Failure to list some cherry-stems and spurs limits ADA access to areas Commenter 142, 620
- **Response:** Thank you for your comment. In the Final EIS, Modified B includes a number of spur roads that are open for wheeled motor vehicle use. In general, these roads are open for all types of vehicles.
- 12. 09N12, 09N12A, 09N12AN, 09N12B, 09N12C, 09N12D, 09N12E, 09N13 and all lettered sub roads. The disabled veterans need ATV access on these roads. 09N12 has a large logging spur for safe camping. First campsite on right hand side of road needs access for camping. 10N50, 10N50A, 10N50B, 10N50C, 10N50D, 10N50E, 10N50F, 10N50G, 10N50H, 10N50J, 10N50K, 10N50L, 10N50M, 10N50N, 10N50P, 10N50R, 10N50S, 10N50T, 10N50U, 10N50V, 10N51, 10N98, 10N98B, 10N99, 10N39, 10N39A, 10N39B, 10N39C, 10N39D, 10N39E, 10N39F, 10N59, 10N55. Upon going west on Rd 7, passing 10N39, 10N89 on left, first left turn is a logging spur. Needs to be addressed in the DEIS and open to street legal vehicles and for camping.

# Commenter 165

- Response: Thank you for providing this information. This information was considered in modifying Alternative B between the DEIS and FEIS. Appendix F Modified B lists the rationale for not allowing public wheeled motor vehicle use on NFS ML-2 roads previously open to motor vehicle use, or for restricting the class of vehicles that can use the road. NFS ML-1 roads were originally constructed as intermittent service roads and were not intended to be open to motor vehicle use, although a majority of them are no longer physically closed. Under Modified B in the FEIS, some of these roads will allow motor vehicle use (and be designated to ML-2 roads), where they are consistent with ENF LRMP standards and guidelines and they enhance the recreation experience by connecting routes or areas, provide access to an area of interest, or allow access to dispersed camping. Approximately 27 miles of unauthorized routes are proposed to allow use in order to provide access for camping and other recreation activities.
- 13. Keep all saddle stock and OHV trails open. Older generations use OHVs to get around. Commenter 1009
- **Response:** Thank you for providing this information. This information was considered in the development of a new Alternative between the DEIS and FEIS.
- 14. I physically cannot hike to the dispersed campsites. Groups who cannot easily hike into primitive campsites should not be discriminated against, or placed in unsafe circumstances to enjoy their forest.

Commenter 668, 1019

- **Response:** This Travel Management project is designed to provide reasonable access for public wheeled motor vehicles and the decision to be made would apply to all Forest visitors. The impact to visitors, including those that cannot hike to dispersed camping areas, is displayed in Chapter 3 of the FEIS and in Table 2-16. This information will be considered by the Forest Supervisor in making a final decision.
- 15. Motorized access is very important to me due to my disability; the only way for me to get into the forest is by 4 wheeler; consider all [other existing]road and trail access for the

handicapped (per ADA of 1990); the forest is one of the places challenged children can come to recreate.

Commenter 92, 142, 219, 235, 275, 281, 379, 398, 462, 470, 471

**Response:** Thank you for providing this information. This information was a factor in modifying Alternative B between the DEIS and FEIS. Modified B provides a higher level of access than Alternative D, which was the preferred alternative identified in the DEIS, while still minimizing impacts to certain resources.

16. I was glad to see mention of the disabled person's desire to visit the NF. My wife's only opportunity to visit on the NF is as a passenger on an OHV.

Commenter 1055

**Response:** Thank you for providing this information. This information was a factor in modifying Alternative B between the DEIS and FEIS. Modified B provides a higher level of access than Alternative D, which was the preferred alternative identified in the DEIS, while still minimizing impacts to certain resources.

17. Disabled individuals have and wish to continue using these public rights of ways without discrimination.

Commenter 1059

**Response:** This Travel Management project is designed to provide reasonable access for public wheeled motor vehicles and the decision to be made would apply to all Forest visitors. As stated in the preamble to the national Travel Management regulations, there is no requirement to allow people with disabilities to use motor vehicles on road or trails otherwise closed to motor vehicles since such an exemption could fundamentally change the travel management program (Fed Reg V.70, No. 216, p 68285). Restrictions on motor vehicle use that are applied consistently to everyone are not discriminatory.

18. Closing roads to vehicle access restricts many disabled or physically challenged peoples to even visit the outdoors.

Commenter 1064

Response: Although the various alternatives considered in the FEIS include restrictions on where public wheeled motor vehicle use will be allowed, all of the alternatives maintain a significant number of miles of roads and trails open to motor vehicle use. The analysis of effects in Chapter 3, (Recreation and Socioeconomic sections) and Table 2-16 in Chapter 2 display the impacts of restricting public motor vehicle access, including access by people with disabilities, so that the Forest Supervisor can make an informed decision. The effects analysis does show that those alternatives with greater restrictions on public wheeled motor vehicle use of roads and trails impact persons with disabilities to a greater extent than those alternatives with fewer restrictions, particularly for those routes which provide access to recreation opportunities such as dispersed camping, streamside access, etc.

19. At my age I need to drive closer to trails

Commenter 149

**Response:** Thank you for providing this information. This information was a factor in modifying B between the DEIS and FEIS. Modified B provides a higher level of access than Alternative D, which was the preferred alternative identified in the DEIS, while still minimizing impacts to certain resources.

20. Younger families cannot access those places with their young children because of the increased time it takes to get there and young children's capacity for walking distances

Commenter 235

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**Response:** Thank you for providing this information. This information was a factor in modifying Alternative B between the DEIS and FEIS. Modified B provides a higher level of access than Alternative D, which was the preferred alternative identified in the DEIS, while still minimizing impacts to certain resources.

21. The FS should not allow vehicles in areas like Caples Creek, upper Silver Fork, and Rubicon River canyon.

Commenter 350, 873

**Response:** Thank you for your comment.

# Air Quality /Global Warming

1. The DEIS makes the statement that, "Hazardous pollutants in burn emissions are very minor, and there are no hazardous pollutants in vehicle emissions. For these reasons, there are no known hazardous pollutants emitted in significant amounts in relations to this project." This statement is completely false; off-road motorcycles and ATVs use two- and four-stroke gasoline engines. Two-stroke engines, in particular, are incredibly polluting; The DEIS should disclose the effects of all these pollutants on hikers, when they are expected to share trails with OHVs; Hikers must breathe the dust and other particulates and emissions created by OHV activity.

Commenter 389

**Response:** Thank you for your comment. A definition of hazardous pollutants has been added to the FEIS. The effects of dust, other particulates, and emissions on hikers have been disclosed in the FEIS in Chapter 3, Air Quality.

2. The DEIS makes no mention of Greenhouse Gases. The Forest Service has an obligation to disclose the contribution to greenhouse gases from recreational vehicle use on National Forests; Motor vehicle climate change emissions include: carbon dioxide (CO2), methane (CH4) and nitrous oxide (N2O); The EIS should show how the USFS intends to comply with the spirit of California's recently adopted Global Warming Solutions Act of 2006.

Commenter 389

**Response:** Thank you for your comment. The FEIS discloses the effects of carbon dioxide, methane, and nitrous oxide in the Air Quality section of Chapter 3. Information concerning Greenhouse gases has been added to the FEIS in Chapter 3, Air Quality.

3. Off-road vehicle use should be restricted and reduced to the maximum extent to minimize greenhouse emissions, noise, PM2.5, dust, soil erosion and to sustain natural processes. Motorized vehicles will have a greater impact, and natural recovery is expected to decrease. Climate changes are expected to increase potential of actual evapotranspiration, meaning soils are less resistant to vehicular impacts and will take longer to recover. Forest management must make use of current IPCC of the state of California finding regarding climate change - plan and take action accordingly.

Commenter 42

**Response:** Thank you for your comment. In the Air Quality section of Chapter 3, the effects of this project on greenhouse emissions, PM2.5, and dust are disclosed.

4. Unauthorized routes are not in an acceptable condition, unless information exists to the contrary. This is based on the fact that unauthorized routes were created without engineering design and have not had maintenance in the past. This is another ludicrous assumption. Some of the so-called unauthorized trails are in better shape and have seen more maintenance than a lot of the NFS trails. WE OHV VOLUNTEERS DO maintenance!

Commenter 53, 334, 386

**Response:** Thank you for your comment. Assumptions were used to provide consistency in the analysis of effects. Where information exists to the contrary of the assumption it was used in the analysis.

5. Ch. 3, page 48, "Unauthorized routes are not in acceptable condition unless information exists to the contrary. This is based on the fact that unauthorized routes were created without engineering design and have not had maintenance in the past." this sentence is a case of guilty unless proven innocent. The National OHV Rule implies that all OHV travel ways are to be designated open unless found to be unsuitable.

Commenter 386

Response: Thank you for your comment. Designations of roads, trails, and areas for motor vehicle use should be based on accurate, pertinent, unbiased information. The Department does not believe that it is necessary to have independent scientists review proposed designation decisions. The Department disagrees that motor vehicle use should be allowed only when it can be clearly proven to be harmless to the environment, and that motor vehicle use should be restricted only when it can be clearly proven to be harmful to the environment. Rather, designation decisions will be made in accordance with the criteria in § 212.55 of the final rule.

6. The Forest Service's policies on recreational vehicle use also contribute to unhelpful public attitudes; encouraging the frivolous use of fossil fuels and countering messages intended to encourage personal responsibility for change.

Commenter 389

Response: Thank you for your comment.

# Aquatic/Hydrology/ Soils

1. The Riparian Conservation Objectives (RCO) analysis conducted for this project indicates that none of the action alternatives would meet four of the six Objectives identified in the SNFPA.

Commenter 389

Response: Thank you for your comment. The analysis of the Riparian Conservation Objectives (RCOs) has been rewritten using the elements described in #1, 2, and 3. The analysis of the RCOs includes an expanded discussion of how each alternative affects water quality, existing beneficial uses of water, geomorphic and biological characteristics of special aquatic features, and habitats for aquatic and aquatic-dependent species. All of the RCOs would not be met for each alternative. As a result, Chapter 2 of the Final EIS acknowledges that non-significant Forest Plan amendments are needed in order to designate routes within meadows. Chapter 3 of the FEIS displays the environmental consequences of implementing each of the alternatives.

2. Provide safe and environmentally friendly crossings at stream crossings instead of closing the routes.

Commenter 204

Response: Thank you for your comment.

3. While there is a several mile difference between Alternatives B and E, the differences between D and E are slight, and even Alternative E fails to meet the SNFPA objective #2 criterion that RCAs in 7th Field Watersheds do not exceed a route density of 5 mi/sq. mile. Measuring Alternative consistency with a second Objective #2 criterion, watersheds do not

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have more than 30 crossings per mile of RCA; while an improvement over the other action alternatives, Alt. E fails to meet the SNFPA objective; The third criterion for Objective #2 is Routes in RCAs identified as being in poor condition; Even Alternative E fails to meet the SNFPA objective. Clearly, the Forest Service must craft an alternative that meets all the RCO objectives, or modify Alternative E to meet them.

# Commenter 389

**Response:** The analysis of the Riparian Conservation Objectives (RCOs) has been rewritten using the elements described in #1, 2, and 3. The analysis of the RCOs includes an expanded discussion of how each alternative affects water quality, existing beneficial uses of water, geomorphic and biological characteristics of special aquatic features, and habitats for aquatic and aquatic-dependent species. As a result, Chapter 2 of the Final EIS acknowledges that non-significant Forest Plan amendments are needed in order to designate routes within meadows.

A different analysis approach was used. The analysis in the Final EIS is a **relative risk** assessment of each alternative resulting in a change in the condition of aquatic features in the Eldorado National Forest. This was accomplished using numerical criteria to identify specific aquatic features where aquatic habitat will be at a high risk of being adversely affected as a result of sediment from unpaved roads.

Modified B has eliminated a number of road segments in the vicinity of observations of sensitive aquatic species and Management Indicator Species.

4. The Soils analysis relies on the route evaluation forms described in the Data section. Since the data on those forms is not reliable, neither is analyses based on those forms.

### Commenter 389

**Response:** Thank you for your comment. In the final EIS, the potential impacts to soil resources were evaluated using six indicators. The analysis of the route evaluation forms was only one of six indicators—and not the most important one—in disclosing potential impacts on soils.

5. The data in Table 3-6 inaccurate; it underestimates considerably the miles of roads and trails susceptible to gully erosion; it begins with the assumption that only routes on slopes greater than 30% have a high potential to capture and concentrate runoff that can lead to gully erosion; the Rock Creek Recreational Trails Plan, which asserts: slopes under 15% are only suitable for vehicle use with effective drainage; trails with a 15% to 22% gradient are suitable with effective drainage, and hardening on some soil types; and routes with 22% to 30% are suitable only with effective hardening in addition to effective drainage, with scheduled monitoring and maintenance required

## Commenter 389

**Response:** Thank you for your comment. The commenter confuses trail gradient with hill slope gradient. Indicator 1 is not an indicator of the susceptibility of gully erosion on roads and trails, but is an indicator of the potential for gully erosion on the slopes below the road or trail where runoff exits the tread. This potential for gully erosion is based on the probability of roads and trails capturing surface and subsurface runoff because of steep side slopes and shallow soils. This association was also mentioned in Coe's paper (page 31).

The cited Rock Creek Plan is correct in linking steeper road and trail gradients with a higher potential for erosion. An attempt was made to evaluate this type of erosion for the EIS, but the database could not support the analysis. This is stated in the FEIS.

6. There is a problem with Table 3-7: Number of NFS ML-1 and ML-2 roads by Condition and Alternative. The information displayed would have more meaning if it was in miles of road,

or roaded acres, rather than numbers of roads. Comparing numbers of roads, without knowing the length of the road or roaded acres is not helpful in determining relative impacts. This applies also to Figure 3-1.

#### Commenter 389

**Response:** We agree that length of routes in poor condition is a meaningful measure, but feel that the number of routes in poor condition is also a meaningful measure. Many of the factors that were considered in rating a route in poor condition are site specific but may affect the route over a long length. For instance, two short segments of road with poor drainage may lead to a rating for the road of >20% being in poor condition. By displaying the total number of miles of roads in poor condition, the decision maker and the public would not have a sense of the number of routes affected, which is also important information to consider in making a decision. ML-1 and ML-2 roads are commonly less than 3 miles long and of roughly similar lengths. We feel that the number of routes provides a useful comparison between alternatives.

7. Table 3-7, which also relied on the route evaluation forms, is inaccurate. We do agree with the information under Indicator Measure 4 (p. 68) regarding the wetting front, which supports the seasonal closure

#### Commenter 389

**Response:** In the final EIS, the potential impacts to the soil resources were evaluated using six indicators. The analysis of the route evaluation forms (we assume this relates to the condition the 400 NFS ML-1 and ML-2 roads, is indicator 2 in the FEIS) was only one of six indicators—and not the most important one—in disclosing potential impacts on soils.

8. In no case during the winter season does the occasional winter rutting and low spot drainage problems occur over any more than <0.01% of trail mileage. Those water ruts do not inflict any environmental damage outside of the trail zone. Arbitrary for the FS to close the entire trail system for small wet season wear on trails.

## Commenter 53, 1030

Response: We agree that winter rutting and low spot drainage problems are a small percentage of trail mileage. But the winter closures apply to unsurfaced roads as well as to trails. Even though ruts on roads are small in aerial extent, they do concentrate water, and this often damags drainage structures. Rutting on trails also concentrates water and can damage drainage structures, but to a lesser extent. Low spot drainage problems on trails often lead to trail widening and, although small in area, ruts and low spot damage are expensive and difficult to repair. Minor reroutes are often the best solution. With limited funding for maintenance this type of damage is unaffordable. Also, because roads and trails are linear features, rutting on them can lead to sedimentation and degradation of water quality.

9. In a study done by Robert Poff, soil scientist hired by FS, concluded in a study that more damage is done by the dust moving away from the trail bed during dry conditions than the compaction that happens when the soil is wet.

### Commenter 1065, 1067

Response: I believe this refers to me, Roger Poff, and one of my reports. However, the statement is true, and occurs in several of my reports, but it is taken out of context. The context is hand-constructed and user-created singletrack trails constructed in surface soils, typically high in organic matter and often derived from volcanic bedrock. When dry, traffic in these situations leads to entrenchment by dusting. Proper trail design and construction would excavate through the topsoil down to the more clayey subsoil where a compacted tread could be created. Under proper moisture conditions, traffic helps compact the treads and results in

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less soil loss by dusting. In any case, the cited statement does not apply to properly constructed singletrack trails or to roads.

- 10. The DEIS fails to disclose that the Forest Service is subject to permitting requirements for its OHV trails and roads, as it must comply with requirements of both the federal Clean Water Act and the California Porter-Cologne Water Quality Control Act; Should the Forest Service proceed without obtaining required permits, it violates the law; In addition to the permitting requirements for point source pollution, the Forest Service is required to meet its own water quality management plan for non-point source pollution. Among other things, for OHV this provides:
  - "Each Forest's OHV plan will:
  - 1) Identify areas, or routes, where OHV use could cause degradation of water quality.
  - 2) Establish baseline water quality data for normal conditions as a basis from which to measure change.
  - 3) Identify water quality standards and the amount of change acceptable.
  - 4) Establish monitoring methods and frequency.
  - 5) Identify controls and mitigation appropriate in management of OHVs.
  - 6) Restrict OHV use to designated routes."

Designated OHV trails and roads will discharge pollutants into waters of the United States through point source conveyances. Sediment is a pollutant, as are other contaminants such as petroleum products. The DEIS documents that these sources of pollution will reach waters of the United States through discrete point source conveyance; failure to comply with governing standards, which likely are intended to ensure that certain stream crossings will not act as point sources. The DEIS relies upon the Sierra Nevada Framework Plan Amendment, which provides Directions for Riparian Conservation Areas and Critical Aquatic Refuges. Among other restrictions, it stipulates that OHV Trails are not to be designated on Forest Service routes with rutting and live water stream crossings. (pp. 414-415) Despite this prohibition, the DEIS contemplates that there will be designated OHV routes throughout the 17,000 stream crossings, some of which are "live stream crossings." (p. 80); The DEIS acknowledges that a direct effect of OHV routing is rutting and rilling of routes so as to transport sediment directly to waters of the United States. It first states that "native surface roads are the primary source of sediment . . . "; The DEIS acknowledges miles of routes on steep slopes which will contribute directly to sedimentation. "The routes displayed in Figure 3-11 (depicting miles of routes on steep slopes) above have a high likelihood of erosion and potential sedimentation given the shallow soils on steel hill slopes." (p. 90) This same chart "illustrates which watersheds have the greatest potential for erosion and sedimentation and increased peak flows since these routes open for public wheeled motor vehicle use are all located on steep ground with sensitive soils. . . These watersheds are located on the western edge of the Forest, and the ability to effectively manage these routes is limited due to public demand and landownership issues in the watershed. Each of these watersheds is likely to have relatively high levels of erosion and sedimentation functioning as extensions of the drainage network." (p. 89); The DEIS fails to adequately disclose and document conditions to enable analysis of these impacts. While claiming that "very few routes are expected to have conditions that lead to stream sedimentation," the DEIS admits that "evaluations have not been ground verified and the areas identified as having potential issues need to be evaluated further." (p. 82) Moreover, "[r]outes in poor condition also tend to be sources of chronic erosion . . . None of the data has been field verified. . . Table 3-17 displays routes by Alternative likely to have chronic sources of erosion and potential sedimentation issues." (p.95); the Forest Service is required to meet its own water quality management plan for nonpoint source pollution; Appendix F Route Numbers for Alternatives, it fails to correlate each of those to the potential for degradation of water quality. Baseline water quality data is not

provided or established. The DEIS fails to identify water quality standards and the amount of change acceptable. Nor does it properly establish monitoring methods and frequency, and identify controls and appropriate mitigation. (See Exhibit 11 for photo documentation of point and non-point source pollution.)

#### Commenter 389

**Response:** There are several important changes in the sections for hydrology and aquatic resources in the Final EIS when compared to the Draft EIS.

A different analysis approach was used. The analysis in the Final EIS is a **relative risk assessment** of each alternative resulting in a change in the condition of aquatic features in the Eldorado National Forest. This was accomplished using numerical criteria to identify specific aquatic features where aquatic habitat will be at a high risk of being adversely affected as a result of sediment from unpaved roads and trails.

A Monitoring Plan has been developed based on the analysis of the Riparian Conservation Objectives contained in the Sierra Forest Plan Amendment of 2004. The Monitoring Plan will a) identify perennial and seasonal streams that are experiencing adverse effects to aquatic habitat as a result of sediment from unpaved roads on-the-ground, and b) implement corrective measures to road segments that are contributing to the identified streams.

A modified version of Alternative B has been created. Modified B has eliminated a number of road segments in the vicinity of observations of sensitive aquatic species and Management Indicator Species.

The analysis of the Riparian Conservation Objectives (RCOs) has been rewritten using the elements described in #1, 2, and 3. The analysis of the RCOs includes an expanded discussion of how each alternative affects water quality, existing beneficial uses of water, geomorphic and biological characteristics of special aquatic features, and habitats for aquatic and aquatic-dependent species. All of the RCOs would not be met for each alternative. As a result, Chapter 2 of the Final EIS acknowledges that a non-significant Forest Plan amendment is needed in order to designate routes within meadows.

Several additional topics are addressed. These include the prohibition of cross-country travel, seasonal road closures, travel over snow, and effects of unauthorized routes.

11. In relation to the DEIS, Indicator measure 5 should read: Total miles of native surface roads closed to public motorized use but open for administrative uses and/or public non-motorized use.

# Commenter 461

**Response:** Thank you for your comment. There is no Indicator measure 5 in the soils section of the DEIS. The commenter may be referring to Indicator measure 3 in the DEIS, Total miles of routes open for public use. This indicator is unchanged in the FEIS. The suggested indicator measure is inappropriate since this project is analyzing the effects of public wheeled motor vehicle use on the ENF..

12. Add to indicator measure 1 that since routes will be closed but not eliminated, soil erosion is likely to continue and may worsen if maintenance levels are reduced.

#### Commenter 461

**Response:** Indicator measure 1 is not an indicator of existing erosion, it is an indicator of the potential risk for gully erosion. It is only used for routes that are designated open, and does not apply to closed routes. A reduction in the level of maintenance would only affect routes that are designated open since closed routes are not maintained. The risk of erosion on

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- closed routes is a function of how effectively they have been restored—including effectiveness of closure—or how well they recover without restoration.
- 13. Change first paragraph on Pg 68 to: The number of routes not open for public use would increase under the action alternatives. Since these routes are still open to administrative use, erosion will continue without treatment.

#### Commenter 461

- **Response:** Routes closed to public use are not open to administrative use. Erosion may continue on some closed routes, depending on how effectively they are closed and how well they recover without use. But they would not be subject to traffic from administrative use.
- 14. As motorized recreation opportunities are decreased, there may be increased pressure to create unauthorized routes. However, public education and enforcement of regulations will effectively mitigate route proliferation.

#### Commenter 461

- **Response:** This has been adequately discussed in both the DEIS and the FEIS. Public education and enforcement may greatly reduce route proliferation, but it is unrealistic to expect it can be eliminated altogether.
- 15. Change fourth paragraph on Pg. 69 to: Fuels treatments open up stands, create fire lines and temp. roads, and generally create opportunities for unauthorized OHV use. This has been a problem in urban-interface areas, and along the heavily used Highway 50 corridor, and in other areas with easy access to the Forest.

#### Commenter 461

- Response: Commenter suggests removing "...has been and would continue to be a problem in urban-interface areas..." The wording in the FEIS is essentially the same. As previously stated, it is unrealistic to expect this problem will be eliminated with route designation. Experience in other areas of California suggests intensive law enforcement and trail obliteration over a period of several years is needed to bring this problem under control. It is not likely to be eliminated, and constant vigilance will be needed to keep under control.
- 16. Delete the last sentence of the 5th paragraph on Pg. 69.

### Commenter 461

- **Response:** Increasing demand is a fact which is documented in the literature cited for the FEIS, and use levels are increasing. Concentrated use on the routes that remain open will increase wear, the potential for increased erosion, and the need for increased maintenance. The sentence remains unchanged in the FEIS.
- 18. There are no scientific studies or articles that support the conclusion of "reduction of rutting and erosion" on p. 69 in Ch. 3 of the DEIS.

# Commenter 360

- **Response:** Thank you for your comment. Increasing demand is a fact which is documented in the literature cited for the FEIS, and use levels are increasing. Concentrated use on the routes that remain open will increase wear, the potential for increased erosion, and the need for increased maintenance.
- 19. Quoted page 80, Chapter 3, Paragraph 1. In table 3-11, page 81 charts 12, 154 stream crossings in watersheds with high stream crossing densities. How many are a few? What effect does OHV use have on these "few" ephemeral stream beds? The table is unclear as to how many stream crossings are actually affecting the watershed, and emphasizes a great many miles of which may not actually be affected by OHV use. To clarify you need to add how many stream beds are not improved and are causing the watershed to be affected. If a

stream has a bridge, culvert, or hardened bottom then the overall effect would be negligible as it pertains to OHV use. Without an inventory of age and condition of these crossings, how can you have an accurate scientific analysis of the actual sedimentation effects on the watershed, as it pertains to OHV use?

Commenter 1059

**Response:** There are several important changes in the sections for hydrology and aquatic resources in the Final EIS when compared to the Draft EIS.

A different analysis approach was used. The analysis in the Final EIS is a **relative risk assessment** of each alternative resulting in a change in the condition of aquatic features in the Eldorado National Forest. This was accomplished using numerical criteria to identify specific aquatic features where aquatic habitat will be at a high risk of being adversely affected as a result of sediment from unpaved roads and trails.

A Monitoring Plan has been developed based on the analysis of the Riparian Conservation Objectives contained in the Sierra Forest Plan Amendment of 2004. The Monitoring Plan will a) identify perennial and seasonal streams that are experiencing adverse effects to aquatic habitat as a result of sediment from unpaved roads on-the-ground, and b) implement corrective measures to road segments that are contributing to the identified streams.

A modified version of Alternative B has been created. Modified B has eliminated a number of road segments in the vicinity of observations of sensitive aquatic species and Management Indicator Species.

The analysis of the Riparian Conservation Objectives (RCOs) has been rewritten using the elements described in #1, 2, and 3. The analysis of the RCOs includes an expanded discussion of how each alternative affects water quality, existing beneficial uses of water, geomorphic and biological characteristics of special aquatic features, and habitats for aquatic and aquatic-dependent species. All of the RCOs would not be met for each alternative. As a result, Chapter 2 of the Final EIS acknowledges that a non-significant Forest Plan amendment is needed in order to designate routes within meadows.

Several additional topics are addressed. These include the prohibition of cross-country travel, seasonal road closures, travel over snow, and effects of unauthorized routes.

20. The Sierra Nevada Forest Plan Amendment emphasizes protection and restoration of riparian areas. Adoption of any alternative would also require amending the Sierra Nevada Forest Plan Amendment, which itself amended Sierra Nevada National Forest Land and Resource Management Plans.

Commenter 389

**Response:** Thank you for comment. With the exception of designating routes through meadows, which calls for a non-significant Forest Plan amendment, the decision will be consistent with the Sierra Nevada Forest Plan Amendment.

# **Botany**

1. Motorized vehicles bring in invasive species and this should be restricted as much as possible.

Commenter 222

**Response:** We agree that motorized vehicles contribute to the spread of noxious weeds as discussed in Chapter 3 of the FEIS under Noxious Weed Risk Assessment and Endangered, Threatened, and Sensitive Plant Species. The mileage along weed infested portions of routes

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is identified for each alternative and ranges from approximately three to five miles for native surface routes.

2. Motorized vehicles are known to contribute to the spread of noxious weeds.

#### Commenter 641

- **Response:** We agree that motorized vehicles contribute to the spread of noxious weeds as discussed in Chapter 3 of the FEIS under Noxious Weed Risk Assessment and Endangered, Threatened, and Sensitive Plant Species. The mileage along weed infested portions of routes is identified for each alternative and ranges from approximately three to five miles for native surface routes.
- 3. The DEIS makes clear the relationship between invasive weeds and roads, as well as the lack of existing surveys of noxious weeds to adequately inform the designation process; By reducing the miles and density of roads available for vehicle use, the ENF can minimize the risk of invasive species. Alternative E best reduces the risk of introducing more noxious weeds.

# Commenter 389

- Response: We agree that Alternative E reduces the risk of introducing and spreading invasive weeds more than the other alternatives, having both the fewest miles of routes in general and the fewest miles of native surface routes that are known to be infested. The analysis for the Noxious Weed Risk Assessment was based on known noxious weed occurrences. Limitations and assumptions of the existing ENF weed database are discussed within the Noxious Weed Risk Assessment. These data are maintained in a GIS layer that is updated as new noxious weed occurrences are located or as known occurrences are revisited or treated. A majority of the infested miles is concentrated in two areas.
- 4. Executive Order 11644 and Forest Service regulations, however, set a much higher bar for designating OHV routes; routes must be designated in such a way as to *minimize* impacts to sensitive plants and their habitat. An attempt to meeting the standards for ESA and NEPA does not accomplish that minimization; On the ENF, impacts to sensitive plants and sensitive plant habitat are well-documented, as is the difficulty of protecting sensitive plants and habitat from the impacts of OHVs. Some examples:
  - Attempts to protect the Eldorado Manzanita (Arctostaphylos nissenana) from illegal OHV use by barricading access to the plants have been repeatedly frustrated by off-roaders who go around the barrier boulders, drive over vegetation to access the area, pull the boulders out of their way.
  - A trail was re-routed in the Gold Note area to protect populations of Pleasant Valley Mariposa Lily (Calochortus clavatus var. avius) that was being impacted in a camping area accessed by the trail. The reroute failed to deter use of the trail or the campsite; both continue to be used and to threaten the plant population. The trail comes within 25 feet of plants. This was a temporary timber road that was never closed.
  - Lava caps are designated an area of concern for vernal annual and perennial plant species on the ENF. Lava caps contain unique plant communities of annual species that appear in the spring, but disappear in the summer, giving the lava cap its "barren" designation. Because these areas are flat and easily accessed, they are commonly used by OHVs, which disturb the habitat. (See 3 photos, exhibit 7)
  - OHVs have damaged sensitive plants and habitat on the Pine Hill Preserve system, and CSNC and other groups have been asked to monitor and report such damage to the State BLM office.
  - Motorcycles have damaged horkelia parryi by driving over the plants. (Exhibit 8) Surveys for sensitive plants on the ENF have been minimal. Most surveys that have taken

place were associated with other projects, such as timber harvest or fuels projects; Because the standard for closing a trail is much higher than the standard for designation, it is vitally important that no route be designated unless it has first been determined that sensitive plants will not be harmed. On suitable habitat, presence must be assumed, unless seasonally-appropriate surveys fail to find plants.

Alternative E reduces the over-all number of motorized routes in potential habitat, and thus the potential for impacting sensitive plants. Because meadows would be protected under Alternative E, it offers the best protection for a number of meadow-associated species. The DEIS notes: "Motor vehicle use is likely to impact other habitats such as meadows and lava caps that exist on gentle slopes or flat terrain with little or no vegetation. OHV damage to meadows on the forest is also well-documented, both by the Forest Service and other forest users. Examples include

- Indian Valley, where CSNC helped the Forest Service put in check dams and plant willows in an attempt to restore the meadow, on which water has been channelized, drying out the meadow and resulting in the replacement of native meadow plants with invasive species.
- Government and Jake Schneider meadows in the Caples Creek Proposed Wilderness
- Lyon's Creek where it crosses Wrights Lake Road;
- Silver Creek, both sides of Wrights Lake Road;
- Barrett Trail where it crossed Mortimer Flat (was re-routed)
- The Rubicon 4x4 trail where it crossed Pleasant Meadow
- Angel Creek where it comes into Gerle Reservoir;
- Meadow along Little Silver Creek in the Rock Creek OHV area. CSNC did a restoration project here as well.
- CNPS observed OHV damage to the McKinstry meadow area, and documented this with pictures in a letter sent to Rich Platt at the Pacific Ranger District in September 2005.

## Commenter 389

Response: The effects analysis for Endangered, Threatened, and Sensitive Plant Species, which addresses effects to sensitive plants and to their habitat, was completed in compliance with NEPA and ESA standards. This analysis allows the Responsible Official to weigh the impacts of each alternative on sensitive plants and their habitat. Executive Order 11644 and Forest Service regulations define no higher standards. Executive Order 11644 does allow the appropriate agency personnel to close areas or trails based on adverse effects from motorized traffic.

We concur that effects to sensitive plants and their potential habitat have occurred from OHV use. Indicator Measure 2 in the effects analysis of the Endangered, Threatened, and Sensitive Plant Species section of the FEIS addresses known effects to sensitive plants by alternative. Indicator Measures 3 and 4 address effects to potential habitat, i.e. meadows and lava caps, that supports sensitive plants.

Monitoring of two sensitive plant species that are found on lava cap has occurred since the 1980's. One occurrence of Eldorado Manzanita that was adversely impacted by motorized vehicle traffic has been protected by an emergency road closure. None of the action alternatives propose to include this route in the travel management system.

Monitoring is proposed in areas of the ENF where concentrated numbers of sensitive plant sites are located along routes; see Monitoring Strategy in Chapter 2 of the FEIS. Measures to protect sensitive plants and their habitat if damage is observed are included under the Monitoring heading of the Endangered, Threatened, and Sensitive Plant Species section of the FEIS.

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- The Forest Botanist used existing ENF sensitive plant records, some of which date back to 1979, as well as the California Natural Diversity Data Base (CNDDB). Many surveys have been completed in association with ENF projects. These seasonally appropriate surveys have been completed from the mid-1980's until the present. Additional sensitive plant locations have been provided by adjacent landowners and by members of groups such as the California Native Plant Society (CNPS). The ENF encourages members of the public to provide information on new and existing occurrences of sensitive plant species, and on new or spreading invasive weed infestations.
- Designations of roads, trails, and areas for motor vehicle use should be based on accurate, pertinent, unbiased information. The Forest Service does not believe that it is necessary to have independent scientists review proposed designation decisions. The Forest Service disagrees that motor vehicle use should be allowed only when it can be clearly proven to be harmless to the environment, and that motor vehicle use should be restricted only when it can be clearly proven to be harmful to the environment. Rather, designation decisions will be made in accordance with the criteria in § 212.55 of the final rule.
- We concur that Alternative E, by reducing the overall number of designated routes in potential sensitive plant habitat, would reduce the potential for adversely affecting sensitive plants and particularly meadow habitats. We concur that damage has occurred within meadows and, as noted above, the ENF has initiated corrective actions at some locations. The ENF appreciates the help of organizations in restoring damaged habitat.
- Sensitive plant (including meadow and riparian species) monitoring is included under Monitoring Strategy in Chapter 2. Refer to Monitoring Strategy in Chapter 2 for opportunities to participate in a collaborative group of public stakeholders.
- 5. Concerned about protecting the Pleasant Valley mariposa lily, *Calochortus clavatus var. avius*. Alternative E provides the greatest protection for this plant.

Commenter 1058

Response: We agree that Alternative E provides the greatest protection for Pleasant Valley

Please adjust this language in the FEIS.

Commenter 334

**Response:** Thank you for your comment. The discussion in Chapter 3 of the FEIS in the Noxious Weed Risk Assessment discusses the rationale behind this conclusion.

9. The list of applicable Standards and Guidelines (S&G) on page 7 - 8 fails to identify Standards and Guidelines for Meadow Management, Botany and Noxious weeds. Nor does it include the Sierra Nevada Forest Plan Amendment S&Gs. DEIS Appendix A Includes a comprehensive list of S&Gs, but their omission in the Purpose and Need section may indicate that they were considered less important than those identified in this section. This has resulted in a range of alternatives, none of which is legally sufficient, in that none of the alternatives meets four of the six SNFPA Riparian Conservation Objectives standards and guidelines.

Commenter 389

**Response:** The list of Standards and Guidelines (S&Gs) under Purpose and Need in Chapter 1 of the DEIS was not intended to represent all applicable S&Gs but rather to identify the primary standards and guidelines related to travel management. The comprehensive list of S&Gs was used in developing the range of alternatives. The final decision will be consistent with the LRMP as amended by the Sierra Nevada Forest Plan Amendment.

Relative to sensitive plant species that occur within meadows, fens, or along small streams, they receive the greatest protection in alternatives that protect the hydrologic, geomorphic, and biological characteristics of those special aquatic features.

# **DEIS Errors**

1. The road before the pier at the west end of Kirkwood Lake should not be considered a 'user-created' road since it was built by the CCC at the government's expense. Please do what you can to correct this error in the inverntory.

Commenter 855, 880

**Response:** Thank you for your comment. In Modified B, the preferred alternative, the above mentioned route will be added to the NF System as a road open only to highway licensed vehicles.

2. On p. 44 Ch. 2 of the DEIS, the summary for Alternative A states "allows wheeled motor vehicle travel on routes and does not prohibit cross-country travel". Conversely in Ch. 3 in Alternative A, it states cross-country travel is prohibited (p. 344)

Commenter 360

**Response:** Thank you for your comment. Alternative A does not prohibit cross-country travel. The wording in the Recreation section of Chapter 3 has been corrected in the FEIS.

3. Indian Valley trailhead into the Wilderness says on table 3-77 in DEIS not accessible by motor vehicle under Alt D. but on map it is open

Commenter 380

**Response:** Thank you for the information. The Alternative D map is correct. Table 3-77 has been corrected in the FEIS.

4. Table 3-96 says 19E04 is open but map says no on Alt B. If it's not open, there would be no way to access wilderness

Commenter 380

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- **Response:** The Alternative B map is correct. Trail 19E04 does not allow public wheeled motor vehicle use in Alternatives B, C, and E. The section discussing changes in trail mileage in the Recreation analysis has been updated in the FEIS.
- 5. NST1904A is listed on 2 roads on the map but it is not in the route inventory. Why was the historic Big Trees Route not included in the list of historic routes?

Commenter 380

**Response:** Thank you for your comment. The Alterative maps have been corrected. The more Southerly route is NST 1904C and NST 1904CA.

6. On Page 71 on DEIS, incorrect id for: R5-2006-0026 as Resolution for commercial silvicultural practices- it is actually the Rice Pesticide Program and R5-2005-0052 is the Conditional Waiver of Waste Discharge Requirements for Discharges Related to Timber Harvest Activities

Commenter 384

7. Sentence on page 346 on Alt A be deleted from final- not based on fact...; change in multiple sentences

Commenter 461

**Response:** Thank you for your comment. The sentence in Alternative A on page 346 is correct based on Table 3-113.

9. 10N02 is listed as 'open to street legal vehicles only' in Alts B, C, and D and in Alt E is listed as 'not open to public motor vehicle use'; E-60 is no longer a County road (now known as 12N60.1?) there is a locked gate near the intersection of 12N60 with 12N64 [see SPI letter for more details]

Commenter 387

**Response:** Thank you for your comment. In Modified B, the Preferred Alternative, 10N02 is listed as "not open to public wheeled motor vehicle use" due to the locked gate.

10. 09N05 does not appear in either of the Alt maps or the App. F, and is sometimes referred to as 09N06, also not on the maps; NST 1724F beyond the private property needs to be non-designated route- this will help OHV's stay off of private land and stay in the correct staging area and areas around

Commenter 365

**Response:** Route 09N06 accesses the Tragedy Spring picnic area. This route does appear on the Alternative A map and allows highway license vehicle use in Modified B. NST 1724 does not allow wheeled motor vehicle use in Modified B.

11. Page 373, paragraph 1 contains four incorrect statements that need to be revised: 1) "Under Alternatives B, C, D, and E, many miles of motorized routes would become available to non-motorized use." This is not true, as all motorized routes already are available for non-motorized use. 2) "There may be an increase in use in some areas because of the potential for user conflicts would be reduced or eliminated." The use of the word "may" is inappropriate and not based on sound facts. As for user conflicts, it is one sided to say that they would be reduced without also stating there is the "potential" for greater user conflicts in the areas where vehicle densities per mile will be higher due to less available road miles. 3) "Along routes where past management practices are noticeable, the negative visual impact may be greater on the non-motorized user than it was on the motorized user." The word "may" is speculative, and it is not based on fact and does not belong in this document. 4) "The duration that elements within landscapes are in view affect the quality of the experience....the hiker may attribute a higher degree of scenic quality to the landscape than the motorcycle rider who

moves quickly through it." The experience is not affected by the mode of travel, it is only by time - hiker will see detail on a smaller scale, where a person in a vehicle will see less detail but more area overall.

#### Commenter 1059

- Response: Thank you for your comment. On page 373, paragraph 1, the statements for items 1), 2), and 3) have been deleted from the FEIS. For item 4), the entire discussion relating to hikers vs. motorists' perceptions of scenic quality has been deleted from the FEIS.
- 12. I found the following discrepancies in your report. Does Alt. B allow for 20.71 miles or 240.7 miles to be used? I would like some clarification; I also think the clarification needs to be emailed to everyone on your list. 20.71 Fg x of DEIS. Table 2-9 and 240.7 miles. Please advise me as to what mileage is correct.

#### Commenter 80

- Response: In the Executive Summary, Alternative B trail mileage was incorrectly reported as 20.71 miles. The correct mileage of 240.7 miles was reported in the Comparison of Alternatives table on page xii in the Executive Summary and page 34 of Chapter 2, as well as the Alternative B mileage summary on page 16 of Chapter 2. This error has been corrected in the Final EIS.
- 13. Comparison of Alts is misleading, mileage discrepancies. Many "unauthorized" routes show on older USGS maps.

#### Commenter 193

- Response: The routes that show on older USGS maps do not necessarily show routes that the Forest Service has Right of Way across private parcels. Other routes on the older USGS maps may have been constructed as a temporary route for emergency operations or authorized under a contract, permit, lease or other written authorization that are not a forest road or forest trail and that are not included in the transportation atlas (36 CFR 212.1). This would account for the discrepancies in mileage.
- 14. Substantive flaws of DEIS: procedural issues with DEIS as it does not follow requirements of many federal regulations governing EIS preparation and the related court guidance governing this decision; DEIS does not comply with many of the OHV planning requirements from the National Travel Management Rule; DEIS does not incorporate the specific remedy/guidance provided by the Chief of FS pursuant to our successful appeal of the prior ENFLRMP OHV travel plan; lacks a description of the planning analysis, rationale and plan formulation methodology for each of the alternatives developed

# Commenter 385, 705, 881

Response: Thank you for your comment. On August 16, 2005, the U.S. District Court ordered the ENF to withdraw the 1990 OHV Plan and issue a new Plan, following the National Environmental Policy Act (NEPA) guidelines, by December 31, 2007 (since extended to April 2, 2008). The Draft and Final EIS are being prepared in accordance with NEPA of

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16. There was insufficient notice given to equestrians informing them their historic right to use the trials was in jeopardy.

Commenter 375

- **Response:** Please refer to Appendix A in the Final EIS for a more in-depth explanation of public involvement related to this project. We received comments on the Draft EIS from over 6,000 groups and individuals with a range of interests including motorized and non-motorized recreation, forest access, and resource protection.
- 17. Frustrated with FS strategy of closing large portions of the existing route system, followed by the unspecified and optimistic promise of working with the public to add routes to the system later.

Commenter 360

Response: Thank you for your comment.

18. Remove reference to MET 10N50 instances of stuck vehicles requiring need for expensive extraction resources. Inaccurate and corrupts DEIS. NOI specifically excludes "search and rescue operations."

Commenter 461

- **Response:** Instances of vehicles getting stuck on NFS road 10N50 with passengers needing to be extracted is accurate. The exclusion of search and rescue operations in the NOI pertains to not allowing wheeled motor vehicle use on specific routes during search and rescue operations. The reference in the Draft EIS is to provide one of the reasons that a specific prohibition to wheeled over the snow travel is applied to a portion of 10N50.
- 19. Remove speculative statement regarding potential for increased motorcycle traffic between Martin Meadow Campground and Silver Lake-Horse Canyon trail. No study was conducted to substantiate speculation. Corrupts DEIS.

Commenter 461, 601

- **Response:** Thank you for your comment. The Forest Service Handbook (FSH 1909.15.15.1) requires that consideration be given to the effects of reasonably foreseeable future actions. Our recreation specialists used best professional judgment in discussing the potential for increased motorcycle traffic in this location.
- 20. Remove speculative statements regarding projection of future motorized use patterns and soil effects

Commenter 461

- Response: Thank you for your comment. The projected increase in motorized use is a component of the cumulative effects analysis in the soil resources section in Chapter 3 of the FEIS. The Forest Service Handbook (FSH 1909.15.15.1) requires that consideration be given to the effects of reasonably foreseeable future actions. Our soil scientist used his best professional judgment in determining future motorized use patters and their effects on soil
- 21. PLP proposes that project is in violation of: RS-2477, Omnibus Consolidated Appropriations Act, Mining Act, Multiple Surface Use Act, Transfer Act, ADA, and Misappropriation of Federal Funds.

Commenter 193

**Response:** Since RS 2477 involves the county claiming jurisdiction over any public highway that predates the reservation of the National Forest, designating public use on NFS roads and trails by vehicle class and season of use would not be a RS 2477 violation. Additionally, exercising RS 2477 would be a county level decision.

According to the Travel Management Rule (36CFR 212), if a written authorization for such activities as livestock operations, mining, logging, firewood collection, and maintenance of pipelines and utility corridors specifically provides for motor vehicle use, that use is exempted from designations and the prohibition regarding motor vehicle use and may continue. The Forest Supervisor retains the authority to regulate uses under a written authorization and to determine whether and under what conditions to authorize motor vehicle use on routes and in areas not generally open to motor vehicle use.

- Wheelchairs are welcome on all NFS lands that are open to foot travel and are specifically exempted from the definition of motor vehicle in § 212.1 of the final rule, even if they are battery powered. However, there is no legal requirement to allow people with disabilities to use OHVs or other motor vehicles on roads, trails, and areas closed to motor vehicle use because such an exemption could fundamentally alter the nature of the Forest Service's travel management program (7 CFR 15e.103). Reasonable restrictions on motor vehicle use, applied consistently to everyone, are not discriminatory.
- 22. DEIS gives no description of wheeled motorized recreation. Research must be done as to what types of vehicles cause what damage in what types of terrain/conditions, or document must be completely rewritten.

# Commenter 439

- **Response:** Thank you for your comment. The Merriam Webster online dictionary gives the following definition for recreation: "refreshment of strength and spirits after work; also: a means of refreshment or diversion: Hobby".
- Wheeled motorized recreation can be defined as using a wheeled motorized vehicle as a means of refreshment or diversion.
- The effects on resources from wheeled motor vehicle travel are listed on page v of the executive summary of the DEIS, under the Purpose and Need for Action.
- 23. It is illegal for the FS to have already missing miles of routes in the no-action alternative Commenter 379
- **Response:** The No Action Alternative (Alternative A) was developed based on an extensive effort to locate all of the NFS roads and trails along with the unauthorized routes which showed current or past motor vehicle use and which could be interpreted as travel ways for motor vehicles. Routes for which a year-round gate or other closure is in place, there is a preexisting decision to close or restrict use, and

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26. If Alt B through E will encourage public access and use of the area, how does the statement on p 372 make sense? "Under [B-E] these alternatives, there is less opportunity for the public to experience the variety of scenic beauty that the forest has to offer than under Alt A."

### Commenter 380

- **Response:** The entire discussion relating to motorized vs. non-motorized users in the visual resource section has been deleted from the FEIS.
- 27. The DEIS lists, under "Consultation," only the USDA Forest Service Pacific Southwest Regional Office and the Alpine, Eldorado, Amador and Placer Counties Boards of Supervisors. No mention of consultation with the public trust agencies, such as California Department of Fish and Game, the U.S. Fish and Wildlife Service, Environmental Protection Agency, or Central Valley Regional Water Quality Control Board.

# Commenter 389

- **Response:** The consultation section in the Final EIS has been updated to more completely reflect the Federal, State, and Local agencies consulted, or that provided guidance, on the Travel Management EIS.
- 28. "Comparison of Alternative" is extremely misleading as the mileage affected is not the same on the various tables and cannot be reasonable compared.

#### Commenter 193

- **Response:** In response to comments received on the DEIS, we have updated the Comparison of Alternative tables in Chapter 2 of the Final EIS. We feel the new tables clearly illustrate the mileage that allows, and does not allow, public wheeled motor vehicle use in each alternative.
- 29. Submitted changes and missing routes during the early part of the inventory process and no changes were made- how many other individuals provided content that was ignored...?

#### Commenter 378

- **Response:** In July and August, 2005, the ENF held public open houses in Placerville, Georgetown, and Markleeville. The purpose of these meetings was to provide the public the opportunity to review the route inventory maps and provide comments on routes not included in the inventory. The suggested missing routes were then ground truthed and, if verified, included on the route inventory maps. Evaluations of suggested routes are located in the project record.
- 30. All statements, tables, maps, and other references to changes in route mileage should be removed from final; mileage in the alt does not match DEIS

# Commenter 461, 681, 737

- **Response:** In Chapter 2 of the Final EIS, new tables were developed that clearly show the mileage available for public wheeled motor vehicle use. Also, references to changes in route mileage in the FEIS have been checked for accuracy.
- 31. There are five assumptions that are not applied uniformly.

#### Commenter 461

- **Response:** The section in Chapter 3 of the FEIS which describes the various assumptions has been revised and these assumptions have been carried forward into the various resource sections of this chapter.
- 32. Table 1-2 does not adequately address Significant Issue Statement 2; Element 2.3 1. and 2. Non-motorized recreation is impacted by motorized travel in numerous ways not captured by these two criteria... include travel on level 2 roads and travel on motorized trails

Commenter 389

**Response:** Thank you for your comment. The miles of maintenance level 2 roads and motorized trails are listed on page xxii of the Final EIS for each alternative for wheeled motor vehicles.

# **Dispersed Camping**

- A number of commenters stated that dispersed camping should be included in this decision.
   Dispersed camping was cited as important to Forest users for a number of reasons including: a cheap way to recreate, gets people away from crowded areas, reduces resource damage, and that is the only reason some users travel on dirt roads. The EIS needs to analyze the impacts of campers moving to adjacent areas.
- Commenter 30, 74, 92, 95, 108, 130, 127, 134, 135, 192, 213, 225, 231, 236, 242, 263, 268, 276, 289, 294, 353, 370, 373, 379, 399, 419, 439, 452, 461, 475, 507, 651, 672, 750, 778, 783, 826, 859, 864, 865, 886, 890, 1064, 1082
- Response: Thank you for your comment. The Forest Supervisor at the start of the project decided that wheeled motor vehicle use of dispersed camping sites would be outside the scope of this project, as stated in the NOI published on October 26, 2005. However, this project has considered identifying routes that provide access to dispersed camping areas in the development of the alternatives. In the Recreation section of Chapter 3 of the FEIS, the effects of implementing the different alternatives in respect to dispersed camping are described. The Implementation Strategy presented in Chapter 2 of the FEIS describes how the ENF intends to develop a strategy for designating areas for public motor vehicle use of dispersed camping areas after the completion of the ROD.
- The assessment of the effects of displacing public wheeled motor vehicle use onto adjacent private land, including for dispersed camping, is presented in the Adjacent Land Ownership section of Chapter 3 of the FEIS. The Implementation Strategy in Chapter 2 of the FEIS includes an element to work with the public to develop a public education strategy to educate forest users about the travel management rules and to assist the public with reading the public MVUM and local travel map. This education will provide information to visitors about the existence of private land within the Forest boundary and request that they respect private land.
- 2. Will PG&E &SMUD pay for all the dispersed campers in new developed campgrounds? Commenter 380
- **Response:** Thank you for your comment. Whether SMUD or PG&E will pay for new developed campgrounds is outside of the scope of this analysis. As part of the relicensing of various hydroelectric power projects on the ENF, the licensees (including PG&E and SMUD) are reconstructing existing recreation facilities associated with the hydroelectric projects or constructing a minor number of new facilities. These new facilities were not in response to this travel management project.
- 3. Designate specific routes leading to traditional dispersed camping spots or at least consider the 50' standard to address these needs.

Commenter 177, 360

Response: Thank you for your comment. Based on comments received on the DEIS, Alternative B was modified between the DEIS and FEIS in order to provide a higher level of access than Alternative D, which was the preferred alternative identified in the DEIS, while still minimizing impacts to certain resources. Many of the roads included in Modified B are secondary roads or short spur roads that provide access to areas used by dispersed recreationists.

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4. I have been engaged in off highway vehicle travel and camping in the ENF since 1994. As a public school teacher, I have a significant amount of time for summer recreation, and the current proposed management solutions will seriously impact my ability to vacation in this area.

Commenter 230

Response: Thank you for your comment.

5. One vehicle length restriction will increase camping/resource damage along roadways

Commenter 414, 565, 1103

Response: Thank you for your comment.

6. Maintain access to dispersed campsites

Commenter 64, 92, 135, 213, 360, 416, 439, 443, 452, 681, 693, 1103

Response: Thank you for your comment.

Spur roads to Spider Lake and Buck Island Lake provide quality camping. New campsite will
be created along trail due to the inaccessability of old sites. Designate camping sites instead
of closing spur roads

Commenter 1108, 1109

Response: Thank you for your comment. Based on comments received on the DEIS, Alternative B was modified between the DEIS and FEIS in order to provide a higher level of access than Alternative D, which was the preferred alternative identified in the DEIS, while still minimizing impacts to certain resources. Many of the roads included in Modified B are secondary roads or short spur roads that provide access to areas used by dispersed recreationists.

8. Identify the location of access driveways and the mileage lost of access driveways, due to reduction in route mileage, also identify how many off road vehicle campsites are lost and how many are replaced along side of roads as a result of the DEIS

Commenter 349

**Response:** The effects on access for dispersed camping are analyzed in the FEIS in the Recreation section in Chapter 3 and shown in Table 3-80. Routes that provide access into many dispersed camping areas were inventoried as part of the Forest route inventory completed in February 2006, and these routes are shown in each of the alternatives.

Keep access to current camps regardless of distance from road. Consider improving existing
camps with fire rings and hardened borders. Authorize vehicle travel up to 100 yards off any
unauthorized route for campsite access

Commenter 153, 565, 659, 668, 677, 1070, 1104

**Response:** Thank you for your comment. The Forest Supervisor at the start of the project decided that wheeled motor vehicle use of dispersed camping sites would be outside the scope of this project, as stated in the NOI published on October 26, 2005. The Implementation Strategy presented in Chapter 2 of the FEIS describes how the ENF intends to develop a strategy for designating areas for public motor vehicle use of dispersed camping areas after the completion of the ROD.

10. Provide more primitive camping as these spots where you don't hear other people. This would solve the problem of too many people.

Commenter 5, 186, 188, 236, 1015

Response: Thank you for your comment.

11. In not designating spur roads and dispersed camping areas, how can you meet your purpose and need? It needs to be part of this process.

#### Commenter 64

Response: Thank you for your comment. Based on comments received on the DEIS, Alternative B was modified between the DEIS and FEIS in order to provide a higher level of access than Alternative D, which was the preferred alternative identified in the DEIS, while still minimizing impacts to certain resources. Many of the roads included in Modified B are secondary roads or short spur roads that provide access to areas used by dispersed recreationists.

12. Impact of proposed closures upon many of the primitive campsites and spur roads that commenter often visits. Particularly in the Silverfork area, since this area has been losing routes more than other parts of the forest.

Commenter 379, 439, 1019

**Response:** Thank you for your comment.

13. This project will restrict access to secluded campsites. Restricting access to primitive camping will result in overcrowded campgrounds where understaffed FS will not be able to enforce the rules. Give people the opportunity to be as secluded as they want while adhering to the regulations of the roads.

Commenter 443, 460, 531, 631, 1020

**Response:** Thank you for your comment.

14. Concerned the proposed Alternative essentially closes all of the dispersed camping locations along the trails. The parking distance of "no more than one vehicle length off the trail" is inadequate for camping. This also poses a safety hazard and increases the risk of theft and vandalism.

Commenter 165, 334, 371, 1070

**Response:** As shown in the Recreation section of Chapter 3 of the FEIS, access is provided to inventoried dispersed camping areas in the different alternatives. The distance wheeled motor vehicles can travel off of a road or trail is based on proposed national FS direction.

15. Parking for dispersed camping limited to one vehicle length from the road's edge destroys safe, relatively dust free, high quality dispersed vehicle camping on public lands. Vehicle camping beyond one vehicle length is NOT travel - travel prohibition has resulted in camping restriction. Impact to dispersed camping is not analyzed properly. Please delineate the number of vehicle campsites and total length and number of associated driveways that have been removed from the system as a result of the travel plan. Please remove the one vehicle length restriction to allow for camping at a reasonable distance - like 100 feet.

Commenter 1070

Response: The effects on access for dispersed camping are analyzed in the FEIS in the Recreation section in Chapter 3. Based on this comment and other similar ones, Alternative B was modified between the DEIS and FEIS in order to provide a higher level of access than Alternative D, which was the preferred alternative identified in the DEIS, while still minimizing impacts to certain resources. Table 3-80 in Chapter 3 of the FEIS and other parts of the Recreation section in Chapter 3 illustrate that the Modified B provides the highest level of access to dispersed camping areas of any of the action alternatives.

16. There needs to be access for safe camping, not just on a main road, where this creates a public safety issue. It puts campers in places which they could be a victim of a crime the way it is set up now. The requirement that our vehicles must park not more than one car length off

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the main road leaves us open to vandalism and theft plus does not support a peaceful atmosphere for relaxation.

Commenter 165

**Response:** The proposed national direction in regards to parking does not require that vehicles may park only along main roads, but rather describes restrictions on parking along any roads that allow wheeled motor vehicle use. Many of the roads included in all of the alternatives within the FEIS are secondary roads or short spur roads that provide access to areas used by dispersed recreationists. The concern about parking was raised by a number of commenters, in regards to safety, security, and recreation opportunity. The Implementation Strategy presented in Chapter 2 of the FEIS describes how the ENF intends to develop a strategy for designating areas for public motor vehicle use of dispersed camping areas after the completion of the ROD.

17. We use the forest for dispersed camping at least 12 times a year. To accomplish this we enjoy using trails such as 12N77A, 09N83, the marked and unmarked spurs off of 13N66, 14N05, 14N09A and 13N41, 10N13C.

Commenter 221

Response: Thank you for your comment.

18. Dispersed camping as proposed, is just another cop out. If the FS inventoried all the trails on the ground then the DR can make a decision on which of these sites created environmental issues. Those that don't I request be designated in the alternative selected.

Commenter 154

**Response:** A determination of which roads or trails should be open to public wheeled motor vehicle use involves more than just environmental impacts along the individual route. Some resource concerns relate to cumulative effects from a number of routes (such as disturbance to certain wildlife species). The national Travel Management regulations (at 36 CFR 212.55(a)) include certain criteria that need to be considered when determining which routes will be open for motor vehicle use, including public safety, conflicts among users, law enforcement needs, maintenance, available resources, etc.

19. Keep dispersed camp spots available on Rubicon

Commenter 108

Response: Thank you for your comment.

20. While the DEIS does not directly address dispersed camping, enforcement of limitation on vehicle distance from authorized routes will tend to confine dispersed camping with large quantities of gear to areas where it is more easily monitored.

Commenter 350

**Response:** Thank you for your comment.

21. This summer there were double the amount of ATV use- for one due to the other closures within the Forest; Blue Lakes and Indian Valley are probably the largest destination camping areas in Alpine County- will ENF put in a developed campground for all the displaced dispersed campers?

Commenter 380

**Response:** The construction or development of developed campgrounds is outside of the scope of this project. The Implementation Strategy p

22. Why will the US Forest Service allow a bunch environmentalist groups to start a movement to reduce and eventually eliminate OHV use while they turn their heads the other way for the Logging Companies. I personally have spent every summer of my life camping in the El Dorado National Forest. Two years ago two US Forest Service Rangers told my family and I that we would no longer be able to camp where we were. We had camped there for 25 years and now our vehicles were causing too much damage. This area was now going to be closed down for rehabilitation.

# Commenter 45

- **Response:** Thank you for your comment. Forest management activities that involve logging activities go through the National Environmental Protection Act process with public involvement like the Travel Management EIS.
- The Forest Supervisor at the start of the project decided that wheeled motor vehicle use of dispersed camping sites would be outside the scope of this project, as stated in the NOI published on October 26, 2005. The Implementation Strategy presented in Chapter 2 of the FEIS describes how the ENF intends to develop a strategy for designating areas for public motor vehicle use of dispersed camping areas after the completion of the ROD.
- The rehabilitation of areas used for dispersed camping will need to have a separate environmental analysis with public involvement before any ground disturbing activities are implemented.
- 23. Silver Fork has been losing routes more than other parts of the forest- unfortunate because many dispersed campsites will be gone

Commenter 379

Response: Thank you for your comment.

24. 09N36 Ridge Tie Tyer Thru is a ML-2 that connects with Iron Mtn Road 10N47 has good dispersed camping sites but is listed as street legal only even though it connects to 09N47 which is open to all vehicles

Commenter 531

Response: Thank you for your comment.

# Draft EIS

1. Does not follow requirements of many federal regulations governing EIS preparation and the related court guidance governing this decision; does not comply with many of the OHV planning requirements from the National Travel Management Rule; does not incorporate the specific remedy/guidance provided by the FS Chief pursuant to our successful appeal of the prior ENF LRMP OHV plan; must be revised to include a description of the planning analysis, rationale and the plan formulation methodology for each of the alternatives developed; fails to include info and public disclosure concerning the formulation of alternatives to meet the planning objectives, alternative evaluation, analysis, and comparison of alternatives

Commenter 385

**Response:** The description of how the alternatives were developed and the comparison of alternatives in Chapters 1 and 2 of the FEIS have been expanded to address the items raised. The description of how the alternatives were developed in Chapter 2 more completely explains the process that was used. The public involvement section of Chapter 1 and Appendix A describes the process the ENF followed to involve the public in the development of the alternatives. The comparison of the alternatives section in Chapter 2 has also been

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revised and compares the alternatives with respect to the criteria outlined in the national Travel Management regulations.

2. Support seeking further continuance for compliance with court deadline

Commenter 8

Response: Thank you for your comment.

3. Travel planning should first list alternatives from all reasonable public suggestions to the most restrictive, then select a preferred alternative.

Commenter 801

Response: Thank you for your comment.

4. Nowhere does it state or refer to what the soil condition criteria is to open or close the trails Commenter 884

Response: The FEIS identifies that during certain months in Alternative C (during November, December, or April) and Alternative D (during the months of December and April) native surface roads or trails may be open to public wheeled motor vehicle use if it is determined by the Forest Supervisor, based on soil moisture evaluations, rainfall, road or trail conditions, and weather forecasts, that routes are suitable for use. Additional information concerning the basis for the dates proposed for the seasonal closure and the explanation of the need for the seasonal closure is described in Appendix D of the FEIS.

5. There are no definition of terms in the DEIS to explain several of the terms used.

Commenter 64, 208, 334, 651, 677, 681, 701, 737, 1108, 1109

**Response:** A glossary is included in Chapter 4 of the FEIS which defines many of the unique terms used in the FEIS.

Remove references to "increased non-motorized use" from DEIS. Outside scope of project and no increase in non-motorized trail mileages is recorded across the alternatives over and above that listed in Alt A

Commenter 461

**Response:** Potential changes in levels of use and other effects on non-motorized recreation use is described in the Recreation section of Chapter 3 of the FEIS as a means to inform the Forest Supervisor and disclosing to the public the effects of implementing each of the alternatives. This information is appropriate in this FEIS.

7. Need clarification on non-significant plan amendments and statement "Non-significant Forest Lands and Resource Mgmt Plan Amendments necessary for this route"

Commenter 64

Response: Additional clarification is presented in Chapter 2 of the FEIS, explaining that non-significant Forest Plan amendments are proposed in certain alternatives in instances where existing ENF LRMP standards and guidelines prohibit or restrict motor vehicle use, but the specific provide a unique recreation opportunity (such as a high elevation trail experience), enhance the recreation experience by connecting routes or areas, provide access to an area of interest, or allow access to dispersed camping. All of the proposed non-significant Forest Plan amendments are for short route segments within meadows, where existing ENF LRMP direction is to prohibit motor vehicle use in meadows and to consider closing roads within meadows. Only a very limited number of routes that conflict with this ENF LRMP standard and guideline are proposed for non-significant Forest Plan amendments, based on the Forest Supervisor's consideration of the recreation opportunities and resource concerns. These non-

significant Forest Plan amendments will allow motor vehicle use on those segments of roads or trails within specific meadows.

8. Waste of time.

Commenter 1000

**Response:** Thank you for your comment.

9. Wants Congress oversight of decision.

Commenter 153

Response: Thank you for your comment.

10. Never before have I seen such a complicated document. You've created a process that is so massive and confusing that it is impossible for a trained professional, much less the average person to understand and comment effectively. It must be simplified. You should focus on smaller areas, like a watershed or 100 sq. mile areas.

Commenter 1041

**Response:** We have attempted in the FEIS to improve the clarity of Chapters 1 and 2 and to simplify the descriptions of some of the analysis in Chapter 3 of the FEIS. The information is complex, and the analyses of environmental effects for various resources are by necessity detailed and often complex.

11. DEIS is flawed with poor science.

Commenter 152, 186, 507

Response: Thank you for your comment.

12. Opposed to further elimination of routes in the alternatives.

Commenter 1028

Response: Thank you for your comment.

13. Attended a meeting in Georgetown about this same topic in the 1970's, why hasn't the FS resolved the matter yet?

Commenter 352

**Response:** In Chapter 1 of the FEIS, there is a discussion on the background of the project which explains why this matter has not been resolved yet.

14. Alternatives include closures that prove that Forest simply doesn't like OHVers.

Commenter 458

**Response:** Appendix F displays the rationale for closing routes. The rationale is based on meeting LRMP standards and guidelines and resource damage.

15. The DEIS to confine OHVs to specifically designated routes is a good step in the process.

Commenter 229

Response: Thank you for your comment.

# **Emergency**

1. How will FS fight fires, and respond to emergencies, if so many roads are to be closed? Commenter 142, 339, 363, 439, 708, 731, 824

**Response:** The Forest Service will continue to suppress wildland fires and respond to emergencies using resources such as air tankers, helicopters, bulldozers, fire crews, etc along with fire engines. If line officer and the fire management determine that closed roads

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- are needed to respond to an emergency, the closed roads will be open for use by the fire suppression personnel.
- 2. With reduced logging of these public lands, we have less equipment access to prevent and fight wildland fires. Will the EIS draft take this into account

# Commenter 150

- Response: The Forest Service has undertaken an extensive program to reduce living and dead fuels on National Forest System lands. In 2000, the National Fire Plan was developed to respond to the severity of wildland fires and their impacts to communities while ensuring sufficient firefighting capacity for the future. The National Fire Plan addressed 5 key points, Firefighting, Rehabilitation, Hazardous Fuels Reduction, Community Assistance and Accountability. The Forest Service and the Department of Interior are working to implement the key points outlined in the National Fire Plan.
- 3. The Healthy Forest Initiative was launched in 2002 by President Bush with the intent to reduce the risks severe wildfires pose to people, communities and the environment. By protecting forests, woodlands and shrublands from unnaturally intensive and destructive fires, the Healthy Forest Initiative helps improve the condition of the National Forest and other public lands, increases firefighter safety and conserves landscapes attributes valued by society. There has been a build up of vegetation that has in turn increased the amount of flammable material in forest. The Forest Service has performed many fuels reduction projects to reduce the amount of flammable material so fires do not burn as intensely nor with such destructive results.
- 4. The Health Forest Restoration Act of 2003 contained a variety of provisions to speed up hazardous fuel reduction and forest restoration projects on specific types of Federal land that are at risk of wildland fire and/or of insect and disease epidemics.
  Evacuation and fire suppression routes would be hampered by the berming and gating of roads.

# Commenter 480

Response: A route that is not actively maintained for passenger car travel (maintenance levels 3, 4 or 5) may not be readily available as a evacuation route. Roads for high clearance vehicles (maintenance level 2) and roads that intermittent service roads (maintenance level 1), which are normally closed may require some degree of maintenance prior to their use for an evacuation or access route for fire suppression forces. The maintenance may include removal of encroaching vegetation, down logs or other obstacles, reducing the height of water diversion structures or smoothing and shaping of road way for vehicle travel.

Gates may present a minor obstacle or delay for fire suppression personnel if they do not open properly, but have not been a significant problem in the past.

5. The restricted non-use of the existing roads and trails will result in over grown vegetation and render thousands of miles of fire breaks useless within 3 years.

#### Commenter 153

- Response: Thank you for your comment. Depending on weather and fuel conditions, fires can burn with great intensity that a road width or trail width would not be an effective fire break. Under the worst conditions for high winds, low humidities and high temperatures, fires can send embers ahead of the fire perimeter to start new fires over 1/4 mile away.
- 6. Allow 4WD public access to all fire routes. Increases recreational opportunities and provides better access in emergencies.

# Commenter 1011

**Response:** Due to the trend of unauthorized route proliferation by wheeled motor vehicle users, there is a need to manage the Forest transportation system in a sustainable manner though the designation of motorized National Forest System roads, trails and areas and prohibiting cross country travel. The public would not have access to all of the routes across the Forest that may be used for fire suppression personnel. The unmanaged public wheeled motor vehicle travel has caused increased conflict between motorized and non-motorized uses, complaints of noise, trespass, dust and vandalism of adjacent property owners and areas of degraded soil, water, vegetation, wildlife habitat and cultural resources.

Increasing recreation opportunities is beyond the scope of this project. When an emergency occurs, the incident management team with the authorized officer would decide and implement the most appropriate means for access.

7. I have yet to see any motorized vehicles intentionally set a forest fire. To the best of my knowledge, every forest fire within the past several years was either caused by lighting or someone with a campfire.

# Commenter 1060

Response: The Forest Service tracks the causes of fires into 9 different categories. Motorized vehicles are included in a category called equipment use. The five year average has equipment use being the cause of 7 percent of the fires on the Eldorado National Forest. The following information is based on the 5 year average percentages of fire causes. Lightning was the highest cause at almost 32 percent. Campfires were the second highest cause at 22 percent. Miscellaneous causes accounted for about 10 percent of the causes. Debris burning was about 8 percent. Arson was attributed to almost 5 percent. Smoking averaged a little over 2 percent of the fire causes. Children averaged less than 1 percent of the causes. Railroads were 0 percent of the causes for the 5 year average.

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does not constitute compliance; the document must also acknowledge the Forest's duty to minimize those impacts and explain how that will be accomplished, and by what standards "minimize" is measured.

### Commenter 389

- Response: The direction in the Executive Orders and national Travel Management regulations to consider minimizing impacts to various resources does not require the Forest Supervisor to select the most restrictive alternative. As described in the Preamble to the national Travel Management regulations "(i)t is the intent of E.O. 11644 that motor vehicle use of trails and areas on Federal lands be managed to address environmental and other impacts, but that motor vehicle use on Federal lands continue in appropriate locations. An extreme interpretation of "minimize" would preclude any use at all, since impacts always can be reduced further by preventing them altogether. Such an interpretation would not reflect the full context of E.O. 11644 or other laws and policies related to multiple use of NFS lands" (Fed Reg V.70, No. 216, p 68281). The Purpose and Need section in Chapter 1 of the FEIS describes the elements from the travel management regulations and Exectuive Orders which were considered in the development of the alternatives, including the direction to consider minimizing the impacts on certain resources. The Comparison of Alternatives discussion in Chapter 2 of the FEIS has been revised to include this discussion. The Record of Decision more thoroughly describes the Forest Supervisor's basis for selecting Modified B, based on consideration of the criteria in the Executive Order and regulations.
- 2. In some cases, even where surveys show OHV use is impacting other resources; those impacts will be allowed to continue to varying degrees in the proposed alternatives. This is a direct violation of the Executive Orders and the Travel Management Rule.

# Commenter 389

- Response: The Executive Orders and Travel Management regulations do not require that the Forest Supervisor select the alternative that minimizes impacts to the greatest extent, but rather that the decision maker considers the effects with the objective of minimizing impacts. The direction allows the Forest Supervisor to balance resource impacts with providing recreation opportunities and public access. The Record of Decision describes the Forest Supervisor's basis for selecting Modified B, based on consideration of the criteria in the Executive Order and regulations.
- 3. Conflict between motorized and non-motorized recreation extends into winter and must be mitigated per the Executive Order, which clearly requires that all motor vehicles, including snowmobiles, be managed. The DEIS is illogical by managing wheeled vehicles but not managing snowmobiles, which is inconsistent with cross-country ski and snowshoe recreation. Conflict between snowmobiles and non-motorized recreation includes: noise, air pollution, safety, and tracks.

# Commenter 1072

- **Response:** In an effort to keep the scope of the project manageable and to be able to comply with a Federal Court order and mandated timeline, the Forest Supervisor at the start of the project, decided that the designation of snowmobile routes would be outside the scope of this project.
- 4. The DEIS needs more time to consider its actions on the EO: Facilitation of Hunting Heritage and Wildlife Conservation- how will closing trails in the Forest lead to the EO's "expansion and enhancement of hunting opportunities"?

Commenter 177, 379

Response: Executive Order: Facilitation of Hunting Heritage and Wildlife Conservation calls on certain federal agencies, including the Forest Service, to facilitate the expansion and enhancement of hunting opportunities and the management of game species and their habitat. This travel management project does not directly manage or restrict hunting, although many hunters use wheeled motor vehicles to access hunting areas. The Recreation section in Chapter 3 of the FEIS describes the effects of implmenting each of the alternatives on dispersed recreation activities, including hunting. Managing public wheeled motor vehicle use will lead to improvements in wildlife habitat, including for various game species, as described in the Wildlife section of Chapter 3.

5. No analysis of realignment or route segments and thus compromised the intent of Executive Order 11644, and considering this would likely better serve the Order's mandate.

Commenter 1039

**Response:** In an effort to keep the scope of the project manageable and to be able to comply with a Federal Court order and mandated timeline, the Forest Supervisor at the start of the project, decided that the construction of new routes and reconstruction of existing routes would be outside the scope of this project. Focusing the scope of this Travel Management project is not inconsistent with the direction in E.O. 11644.

# **Expand Routes/ New Routes**

1. Everything in the plan is based on closing and limiting usage. The sport is growing every year so users require more trails, not less. The DEIS lacks any alternative that increases road or trail mileage.

Commenter 36, 49, 176, 231, 371, 378, 414, 436, 438, 443, 461, 601, 671, 786, 801, 1001, 1086, 1087

Response: This project is to establish the "backbone" of a travel management system, consistent with the national Travel Management regulations and the requirements of a recent Federal Court order. In an effort to keep the scope of the project manageable and to be able to comply with the Court mandated timeline, the Forest Supervisor at the start of the project, decided that construction of new routes would be outside the scope of this project. The national Travel Management regulations at 36 CFR 212.54 provide for revision of designations as needed to meet changing conditions, including the potential to add new routes following public involvement and site specific environmental analysis.

2. California law (Code 5090.02) requires that OHV opportunities are expanded. None of the DEIS alternatives propose this, and thus it is inconsistent with CA law.

Commenter 53, 1030

Response: The reference to California law (5090.02) refers to the California Public Resources Code which provides guidance and direction to the California State Division of Off Highway Motor Vehicle Recreation of the Department of Parks and Recreation regarding off highway vehicle recreation at State Vehicle Recreation Areas and as part of the Off Highway vehicle grant program. The law does not directly apply to the management of National Forest System lands. The section referenced provides guidance on the intent of the legislature and states in full that it is the intent of the Legislature that "Existing off-highway motor vehicle recreation areas, facilities, and opportunities should be expanded and managed in a manner consistent with this chapter, in particular to maintain the sustained long-term use." The guidance to maintain OHV recreation opportunities for sustained long-term use is consistent with the purpose and need of this Travel Management project, as stated in Chapter 1 of the FEIS.

3. Concern that implementation of any plan will result in continually reduced trail inventory and

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trail mileage. Define a process to add new trails since this is not documented in the DEIS. Commenter 49, 60, 231, 378, 379, 461, 601, 671, 786, 801, 891, 1028, 1046, 1047

- Response: This project is to establish the "backbone" of a travel management system, consistent with the national Travel Management regulations and the requirements of a recent Federal Court order. In an effort to keep the scope of the project manageable and to be able to comply with the Court mandated timeline, the Forest Supervisor at the start of the project, decided that construction of new routes would be outside the scope of this project. An Implementation Strategy is presented in Chapter 2 of the FEIS. One element in the Implementation Strategy is to work with a collaborative group of public stakeholders to develop a process for considering the addition of routes or changes in management of the designated system. This strategy would be completed within one year after the collaborative group is established (Page 2-xx of the FEIS).
- 4. OHV recreation enthusiasts have increased 15-fold from 1989 to 2002. The FS should be seeking ways to maximize recreation opportunities, consistent with dictates from Judge Karlton. In light of elimination of many trails, I'm not confident that the FS has done so. I fear that the FS has gone farther than necessary in responding to Judge Karlton.

#### Commenter 60

**Response:** As stated above, an Implementation Strategy is presented in Chapter 2 of the FEIS which includes the commitment to work with a collaborative group of public stakeholders to develop a process for considering the addition of routes or changes in management of the designated system. This strategy would be completed within one year after the collaborative group is established (Page 2-xx of the FEIS). The national Travel Management regulations at 36 CFR 212.54 provide for revision of designations as needed to meet changing conditions, including the potential to add new routes following public involvement and site specific environmental analysis.

5. Keep opening new trails and campsites throughout the Forest.

### Commenter 112

- **Response:** Thank you for your comment. In order to keep the size of the project manageable and to meet the Court mandated timeline, the Forest Supervisor at the start of the project, John Berry, decided that any road or trail construction or reconstruction would be outside the scope of the project. In the Implementation Strategy in Chapter 2 of the FEIS, we state that the development of a process to for considering the addition of routes or changes in management to the designated system will be developed within one year.
- 6. You have stated that OHV sales and use have gone up significantly in the past decade, yet the recent plan has NO pro OHV option. WHY IS THIS?

## Commenter 87

Response: The alternatives included in the FEIS must meet the purpose and need as described in Chapter 1 of the FEIS. As stated in Chapter 1, the purpose of this project is to stop resource damage from use of the inappropriate routes and cross country motor vehicle travel and redirect this use to sustainable NFS roads and trails. In Chapter 1, the need to provide public wheeled motor vehicle route access to dispersed recreation opportunities (e.g. camping, hunting, fishing, hiking, horseback riding) is recognized, along with providing a diversity of public wheeled motor vehicle recreation opportunities (e.g. 4WD vehicles, motorcycles, ATVs, passenger cars), and providing routes that create loops and thru routes to enhance public wheeled motor vehicle recreational opportunities. In an effort to keep the scope of the project manageable and to be able to comply with the Court mandated timeline, the Forest

- Supervisor at the start of the project, decided that construction of new routes would be outside the scope of this project.
- 7. DEIS needs to provide info on planned reroutes and replacement trails, engineered repairs, bridges, and hardening surfaces. All these measures need to be fully planned in the EIS before the final ROD

Commenter 386

- **Response:** The Forest Supervisor at the start of the project decided that reconstruction or relocation of routes would be outside the scope of this project, in order to keep the scope of the project manageable and to be able to comply with the Court mandated timeline. The Implementation Strategy presented in Chapter 2 of the FEIS describes several elements, including completing condition surveys for development of a maintenance schedule and a process for considering adding new routes or changes in routes.
- 8. None of the "Action Alternatives" have provided many routes that create loops in the higher elevations. I need to stress the importance of this issue here.

Commenter 152

Response: Thank you for your comment

9. Loop opportunities need to be considered. Out and back trails are often less enjoyable and increase the likelihood of head-on accidents.

Commenter 61

Response: Thank you for your comment

- 10. OHV use is growing on the Forest. People go out to enjoy nature; if trails are closed, it prevents enjoyment of nature and exploration. The Forest's proposed plans will affect hunters, fisherman, miners, hikers, equestrians, etc.Routes can lead to hunting, hiking, photographic, camping areas. The vast majority of Americans like to travel the range by vehicle.
- Commenter 301, 304, 306, 315, 316, 324, 327, 342, 373, 374, 507, 623, 631, 669, 764, 765, 771, 783, 799, 800, 802, 811, 816, 824, 829, 838, 853, 890
- **Response:** The FEIS recognizes in the Recreation section of Chapter 3 that public wheeled motor vehicle use of the ENF is increasing, that these visitors are participating in a variety of recreation activities during their visits, and that public wheeled motor vehicle use provides access to the Forest as well as being a form of recreation for many Forest visitors. The Recreation section of Chapter 3 of the FEIS describes the effects of implementing each alternative on the recreation opportunities.
- 11. The vast majority of Americans like to travel the Forest by vehicle. DEIS says how the FS wants to enhance quiet recreation, but states nowhere how they wanted to enhance all forms of recreation

Commenter 380

- **Response:** In Chapter 1 of the FIES, the Purpose and Need states that there is a need for limited changes to the system of ENF NFS roads and trails to provide routes that create loops and thru routes to enhance public wheeled motor vehicle recreational opportunities. In the Action Alternatives, 20 to 46 miles of unauthorized routes that are determined to provide excellent outdoor recreation opportunities for motorized and non-motorized users are proposed to be added to the NF transportation system.
- 12. On pg. iii of the summary Intro. there is a statement saying "provide routes that enhance wheeled motor vehicle recreation", there is nothing in Alt D. that 'enhances' OHV riding

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#### Commenter 601

- **Response:** In Chapter 1 of the FIES, the Purpose and Need states that there is a need for limited changes to the system of ENF NFS roads and trails to provide routes that create loops and thru routes to enhance public wheeled motor vehicle recreational opportunities. In the Action Alternatives, 20 to 46 miles of unauthorized routes that are determined to provide excellent outdoor recreation opportunities for motorized and non-motorized users are proposed to be added to the NF transportation system.
- 13. The DEIS fails to address mitigation measures designed to lessen the impact of the proposed project on valuable resources such as the long established trail system. These existing trails are an important resource that should be preserved so that there is no net loss of that valuable resource. Replacing any trails lost would mitigate the impacts of any lost trails.

#### Commenter 82

- **Response:** The effects on recreation visitors and other resources from restricting motor vehicle use on roads or trails are described in Chapter 3 of the FEIS under each of the resource area headings. In the Recreation section of Chapter 3 there is a detailed discussion about the changes in motorcycle trail opportunities between alternatives, and the effect of Forest visitors. The Forest Supervisor at the start of this project decided that construction of new routes would be outside the scope of this project, in order to keep the scope of the project manageable and to be able to comply with the Court mandated timeline.
- 14. The DEIS clearly lacks any alternative that actually increases OHV trails in any of the areas. Commenter 1001, 1028, 1030
- **Response:** Thank you for your comment. In order to keep the size of the project manageable and to meet the Court mandated timeline, the Forest Supervisor at the start of the project, John Berry, decided that any road or trail construction or reconstruction would be outside the scope of the project. In the Implementation Strategy in Chapter 2 of the FEIS, we state that the development of a process to for considering the addition of routes or changes in management to the designated system will be developed within one year.
- 15. Travel Mgmt Plan should define the process for the addition of new routes. Commenter 436, 438
- **Response:** The Implementation Strategy presented in Chapter 2 of the FEIS includes the commitment to work with a collaborative group of public stakeholders to develop a process for considering the addition of routes or changes in management of the designated system following the completion of the FEIS. The national Travel Management regulations at 36 CFR 212.54 provide for revision of designations as needed to meet changing conditions, including the potential to add new routes following public involvement and site specific environmental analysis.
- 16. More OHV users require more trails, not less. Please keep all routes in the Strawberry area and Silver Lake area open.

#### Commenter 176

Response: Thank you for your suggestion. This project is to establish the "backbone" of a travel management system. In response to public comments and additional information, a new alternative was developed between the DEI and FEIS. This alternative provides a higher level of access than Alternative D, which was the preferred alternative identified in the DEIS, while still minimizing impacts to meadows and certain sensitive wildlife habitat, and reducing impacts to stream courses and riparian habitat. The new alternative does propose to allow motor vehicle use on at least some of the routes in the Strawberry and Silver Lake areas, although not all existing routes would allow motor vehicle use. Appendix F displays

for the new alternative the reason for not allowing public wheeled motor vehicle use on NFS ML-2 road with a collaborative group of public stakeholders s previously open to motor vehicle use, or for restricting the class of vehicles that can use the road.

## **Form Letters**

**Note:** The names of the 5,000 or so respondents who submitted form letters are available in the Project Record.

- 1. Outdoor adventure and access to the un-paralleled beauty and nature that California is famous for is a primary reason many residents of this state pay the increased cost of living compared with neighboring states. Closing trails and routes, thus limiting our access to the environment and history of California, is an extreme measure that I don't support.
- I enjoy the opportunity to recreate in the Eldorado National Forest with my family and friends. The opportunity to access primitive campsites by vehicle is a necessity for young children and older individuals. By limiting the OHV access, you are limiting the publics enjoyment of many forms of recreational activity including; fishing, camping, bird watching, hunting and more!
- I ask that you reconsider your plan to close many of the trails and routes of Eldorado National Forest and meet with OHV groups to find a compromise to trail closures such as the Blueribbon Coalitions "Alternative R" as it is referred to. Other options to consider include volunteer help and partnering with organized OHV clubs and groups to maintain the trails and routes.
  - **Response:** Based on this comment and similar comments, Alternative B was modified to provide greater access for all classes of vehicles, comply with LRMP Standards and Guidelines, display rationale for eliminating use on ML-2 routes, minimize impacts to certain wildlife species, and reduce impacts to stream courses. The explanation for why Alternative R was considered but not analyzed in detail in this FEIS is presented in Chapter 2 of the FEIS. As described in Chapter 2, Alternatives Considered but Eliminated from Detailed Study, several elements of this proposal are outside of the scope of the decision to be made.
- 2. I understand your position in this matter. All you are doing is complying with a court order but all of the alternatives outlined except for Alternative A are overly restrictive and would severely limit the intended use of these public lands by the OHV community.
  - Response: Thank you for your comment.
- 3. The seasonal closures as outlined in proposed Alternatives B E are overly restrictive to the public use of the trail system. The closures as outlined call for the public trail system to be normally closed can be as long as November 1st through April 30th. This means that those of us with red sticker off road vehicles would be able to ride only from October 15th to November 1st and from April 30th to May 31st. Buying a new green sticker motorcycles would place a tremendous financial burden on my family and other families that like to use these public lands.
  - Response: Seasonal closures on native surface routes are intended to avoid damage to roads and trails, as well as prevent rutting, soil erosion, and other resource damage. Certain OHVs that do not meet California emission standards are issued red sticker registrations by the California Department of Motor Vehicles. This registration limits the use of these vehicles in certain California OHV riding areas during certain seasons. The most recent schedule of Red Sticker riding areas lists areas on the ENF as having a year round season. The assertion that the seasonal closure will increase summer use and result in more route damage or more accidents is speculative at this time. Condition surveys will continue to be conducted, as described in the Implementation Strategy in Chapter 2 of the FEIS, and will be used to identify needed maintenance.

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- 4. Since the court order makes you do something I do not see how Alternate A would come into play. If I had to make a choice and A was not available, I think Alternate B is a reasonable compromise IF you could add some high country routes to create loops and change the seasonal closure to a normally open wet weather closure policy.
  - Response: Thank you for your comment. Alternative B was modified based on this and other comments received. This alternative provides a high level of access while still minimizing impacts to meadows and certain sensitive wildlife habitat, and reducing impacts to stream courses and riparian habitat. Although not all high country routes and loops are included in Modified B, an effort was made to provide for recreation access, as described in Chapter 2 of the FEIS. An explanation of the basis for the seasonal closure has been added to the FEIS in Appendix D. The seasonal closure proposed in Modified B, which is the same as in Alternatives B and E, is considered to provide the greatest protection of roads and trails when they are most prone to damage and rutting, while still providing flexibility during the times of year when wheeled motor vehicle use may be appropriate, based on soil moisture and rainfall conditions.
- 5. The seasonal closures as outlined are normally closed but there are some circumstances where the regional forest ranger can open the areas on a case-by-case basis. This is overly restrictive because it makes it impossible to make any plans to use the public trail system. I believe that the trail system should be normally open with the current rule of 1 inch of rain in 24 hours = closed for 2 days; 2 inches of rain in 24 hours = closed 4 days.
  - Response: The ENF does not currently have wet weather closure direction as described by the commenter. There is specific wet weather closure direction that applies to the Rock Creek area which allows trails to be open following a 48 hour drying period. The Forest Supervisor has concluded that it is not reasonable to implement this strategy across the Forest, because of the staffing needed to implement signing, gate management, etc., and the ability to inform the diverse publics that use the Forest in a timely way. The seasonal closure included in Modified B allows for public wheeled motor vehicle use during a significant amount of time when weather conditions are not hot and dry. The seasonal closure also allows for use of surfaced roads during the winter period.
- 6. Seasonal trail closures will mean that more people will be using the OHV trail system in the summer. More summer OHV use will result in more dust, more accidents because of limited visibility that the dust creates, and more fire risk at the time when the forest is the driest. In addition, a study done by Robert Poff the soils scientist contracted by the USFS concluded that more damage is done by the dust moving away from the trail bed during dry conditions than the compaction that happens when the soil is wet. Riding on the wet soil keeps the dirt on the trail where it belongs.
  - Response: The statement is true, and may occur in several reports, but it is taken out of context. The context is hand-constructed and user-created singletrack trails constructed in surface soils, typically high in organic matter and often derived from volcanic bedrock. When dry, traffic in these situations leads to entrenchment by dusting. Proper trail design and construction would excavate through the topsoil down to the more clayey subsoil where a compacted tread could be created. Under proper moisture conditions, traffic helps compact the treads and results in less soil loss by dusting. In any case, the cited statement does not apply to properly constructed singletrack trails or to roads.
  - 7. Site Specific Routes:
    - 14N09A Jeep Rd around Hell Hole should remain open to green sticker bikes.
    - Ellicott Bridge should be designated multiple use.
    - The Horse Canyon (17E21) should remain a multiple use trail.

- The South Fork Trail (14E10 & 14E14) should be designated a multiple use trail.
- The Pickett Fence trail on Saylor ridge (NST1716A) and (NST1712A) should be open as provided in the 1990 El Dorado travel plan. The connecting trails (17E16) and (17E12) should remain open.
  - **Response:** Based on comments received on the DEIS, we developed two appendices in order to better illustrate the reasons for not allowing public use on NFS roads. Appendix F lists the reason for not allowing public use on ML-2 roads in Modified B. ML-1 roads were originally constructed as intermittent service roads and were intended to be closed to public motor vehicle use. Appendix G of the FEIS displays the considerations between resource concerns and recreation opportunities or public access for ML-1 roads.
- 8. California law (Code 5090.02) requires that OHV opportunities are expanded.... None of the DEIS alternatives expand the trail riding opportunities. Each alternative reduces and restricts trail riding mileage and seasonal use of the trails. Therefore this DEIS and its alternates are in direct conflict with California Law and should be judged null and void.
  - Response: The reference to California law (5090.02) refers to the California Public Resources Code which provides guidance and direction to the California State Division of Off Highway Motor Vehicle Recreation of the Department of Parks and Recreation regarding off highway vehicle recreation at State Vehicle Recreation Areas and as part of the Off Highway vehicle grant program. The law does not directly apply to the management of National Forest System lands. The section referenced provides guidance on the intent of the legislature and states in full that it is the intent of the Legislature that "Existing off-highway motor vehicle recreation areas, facilities, and opportunities should be expanded and managed in a manner consistent with this chapter, in particular to maintain the sustained long-term use." The guidance to maintain OHV recreation opportunities for sustained long-term use is consistent with the purpose and need of this Travel Management project, as stated in Chapter 1 of the FEIS.
- 10. California Code requires that OHV trails be managed per California Soil management standards. In no case during winter season does the occasional water rutting and low spot drainage problems occur over any more than less than 0.01% of trail mileage. Those water ruts do not inflict any environmental damage outside the trail zone. Since only a very small fraction of trail surface is actually "damaged" during wet season use, it is clearly arbitrary and abusive for the USFS to shut down the entire trail system over such small and insignificant wet season wear on the trails. The occasional water rut low spot is regularly drained by volunteers each year and USFS service personnel.
  - Response: The statement is true, and may occur in several reports, but it is taken out of context. The context is hand-constructed and user-created singletrack trails constructed in surface soils, typically high in organic matter and often derived from volcanic bedrock. When dry, traffic in these situations leads to entrenchment by dusting. Proper trail design and construction would excavate through the topsoil down to the more clayey subsoil where a compacted tread could be created. Under proper moisture conditions, traffic helps compact the treads and results in less soil loss by dusting. In any case, the cited statement does not apply to properly constructed singletrack trails or to roads.
- 11. The seasonal trail closures as outlined will put more pressure on the limited and declining amount of other OHV areas. More people using the limited amount of trails will result in more accidents and perhaps more people dying as a result of these closures.
  - **Response:** Seasonal closures on native surface routes are intended to avoid damage to roads and trails, as well as prevent rutting, soil erosion, and other resource damage. The assertion that the seasonal closure will increase summer use and result in more route damage or more accidents is speculative at this time. Condition surveys will continue to be conducted, as

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- described in the Implementation Strategy in Chapter 2 of the FEIS, and will be used to identify needed maintenance.
- 12. I am grateful that the Forest Service is finally reining in irresponsible, unfettered off-road travel. I do not use off-road vehicles and as a local forest user, I definitely avoid areas frequented by ORVs because they also kick up clouds of dust and fill entire drainages with noise. Off-road vehicles and thousands of miles of unnecessary roads damage our watersheds, degrade habitat for plants and wildlife, and diminish the quality of experience for quiet users.
- I am writing to ask that you adopt Alternative E. Overall; it provides ample motorized access to the forest, while still protecting wildlife habitat, water quality, and quiet places for muscle-powered forest visitors. Please modify Alternative E to include the more protective seasonal closures and over-the-snow requirements of Alternative C.
  - Response: Thank you for your comment. Alternative E was developed to focus on providing greater protection for forest resources and increasing opportunities for non-motorized recreational activities. Alternative E was not modified because it contains the lowest mileage of native surface routes as well as the lowest mileage of native surface routes allowing OHV use thus it was determined that the more restrictive seasonal closure was not necessary.
- 13. Trails within the Rubicon River Canyon must not be designated for motorized use. Hunter's Trail, in particular, is one of the most popular hiking trails on the Eldorado. Motorcycles and ATVs are not compatible with the pristine, wild and scenic qualities of this canyon.
- Less than 3,000 acres of meadow habitat exist on the Eldorado, out of 597,000 total acres. Do not amend the Land Management Plan to allow motor vehicle access to these valuable and rare habitats. In addition, do not designate any motorized use in the Proposed Caples Creek Wilderness!
  - **Response:** Your concerns were taken into consideration when modifying Alternative B.
- 14. I want to see all Inventoried Roadless Areas protected; these areas are essential to fighting one of the Forest Service's "four threats," namely habitat fragmentation. I was disappointed to see the Forest Service's preferred alternative included numerous motorized routes in roadless areas. I urge the Service not to designate the following routes: 11N26F, 17E24, 17E21, 17E19 or any other motorized routes in Inventoried Roadless Areas.
  - Response: Various commenters identified that they feel that wheeled motor vehicle use should not be allowed in IRAs to avoid further habitat fragmentation, and to avoid the spread of nonnative invasive plant species and that IRAs should be managed for "quiet" non-motorized forms of recreation. The regulations for management of IRAs do not preclude the use of motor vehicles for remote recreation. The preamble to the regulations states that the prohibition of road construction, road reconstruction and timber harvesting is considered to protect the values and characteristics of IRAs. Chapter 3 displays a comparison of the effects between the different alternatives on the IRA values established in the regulations. There are portions of the IRAs where the ENF LRMP has established Management Area prescriptions which do not allow for motor vehicle use (Primitive and Semi-Primitive Nonmotorized Management Areas). None of the action alternatives allow for wheeled motor vehicle use within any of these areas.
- 15. Do not add Level 1 roads to the motorized trail system. These roads were not designed for permanent use, especially by off-road vehicles. They should be restored to as close to their preproject condition as possible. Roads and motorized trails are known to contribute to the spread of noxious weeds, another of the identified "threats."
  - **Response:** NFS ML-1 roads were originally constructed as intermittent service roads and were not intended to be open to motor vehicle use, although a majority of them are no longer

physically closed. In modified Alternative B in the FEIS, some of these roads will allow motor vehicle use (and be changed to ML-2 roads), where they are consistent with ENF LRMP standards and guidelines and they enhance the recreation experience by connecting routes or areas, provide access to an area of interest, or allow access to dispersed camping. We agree that motorized vehicles contribute to the spread of noxious weeds as discussed in Chapter 3 of the FEIS under Noxious Weed Risk Assessment and Endangered, Threatened, and Sensitive Plant Species. The mileage along weed infested portions of routes is identified for each alternative and ranges from approximately three to five miles for native surface routes.

16. I am also concerned about how much it costs to maintain and enforce a route system as expansive as the one proposed in the preferred alternative. The Forest Service has a huge road-maintenance backlog. Please protect natural and cultural values by authorizing a road system that the Forest Service can afford to maintain and enforce.

**Response:** Thank you for your comment.

- 17. I urge you to release an EIS that incorporates these recommendations and closes portions of the road system that are contributing to degradation of our national forest. Please prioritize the protection of resources and quiet-use opportunities over the call for more unnecessary access.
  - Response: Thank you for your comment. As stated in Chapter 1 of the FEIS, the purpose and need for this Travel Management project is to stop resource damage from the use of inappropriate routes and cross country motor vehicle travel and to redirect this use to sustainable NFS roads and trails. National Forests are managed by law for multiple uses. They are managed not only for preservation of natural values, water quality, wildlife habitat, endangered species, and biological diversity, but for timber, grazing, mining, and motorized recreation. These uses must be balanced, rather than one given preference over another.
- 18. As an Eldorado National Forest user, I enjoy quiet, undisturbed areas and avoid areas frequented by off-road vehicles, as they kick-up clouds of dust, fill entire drainages with noise, damage wildlife habitat, and degrade water quality. I am a strong proponent of the Roadless Area Conservation Rule and believe that the designation of routes for motorized travel in roadless areas is incompatible with the long term protection of these special forest lands. Motorized travel will erode roadless character, intensify conflicts with non-motorized recreationists, and foster the spread of invasive plants.
- Consequently, I encourage you to adopt Alternative E of the Draft Environmental Impact Statement for Travel Management, which restricts motorized use in roadless areas on the Forest and the Caples Creek Proposed Wilderness area.
  - Response: Various commenters identified that they feel that wheeled motor vehicle use should not be allowed in IRAs to avoid further habitat fragmentation, and to avoid the spread of nonnative invasive plant species and that IRAs should be managed for "quiet" non-motorized forms of recreation. The regulations for management of IRAs do not preclude the use of motor vehicles for remote recreation. The preamble to the regulations states that the prohibition of road construction, road reconstruction and timber harvesting is considered to protect the values and characteristics of IRAs. Chapter 3 displays a comparison of the effects between the different alternatives on the IRA values established in the regulations. There are portions of the IRAs where the ENF LRMP has established Management Area prescriptions which do not allow for motor vehicle use (Primitive and Semi-Primitive Nonmotorized Management Areas). None of the action alternatives allow for wheeled motor vehicle use within any of these areas.
- 19. Secondly, modify Alternative E to make trails in the Rubicon River corridor non-motorized. Hunter's Trail is the most popular hiking trail on the Georgetown Ranger District and noisy dirt bikes and off-road vehicles are completely incompatible with the experience sought by the hikers

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and fishermen who use these trails. Finally, I urge you to adopt the seasonal motor vehicle closure requirement in Alternative C (November 1 to April 30) to ensure that surface roads and trails are protected from wet weather damage.

**Response:** Alternative E was not modified because it contains the lowest mileage of native surface routes as well as the lowest mileage of native surface routes allowing OHV use thus it was determined that the more restrictive seasonal closure was not necessary.

20. The Eldorado National Forest is important to me, both as someone who enjoys recreating in it and as someone who is concerned about the preservation of its unique natural values. Allowing motorized use in these wildlands will reduce the recreational opportunities for quiet recreationists like me. I am one of the 93% of National Forest users who do not use off-road vehicles for recreation and I believe Alternative E (with modifications as identified above) provides ample motorized access to the forest, while still protecting wildlife habitat, water quality and quiet places for traditional forest visitors.

**Response:** Thank you for your comment. Alternative E was developed to focus on providing greater protection for forest resources and increasing opportunities for non-motorized recreational activities.

# **Hazards**

1. There should be a description of the populations potentially exposed to the serpentine asbestos in the roads, and an evaluation of the level of exposure and impacts to these people, as well as related regulations and mitigations also.

Commenter 389

**Response:** The project file contains a copy of the state which displays the location of serpentine soils on the forest. These serpentine soils may contain asbestos. About 4.5 miles of routes cross these soils on the Georgetown Ranger District. A list of routes has been added to the analysis in Chapter 3 in the Air Quality section.

# **Inventoried Roadless Area**

I am a strong proponent of the Roadless Area Conservation Rule and believe that the
designation of routes for motorized travel in roadless areas is incompatible with the long term
protection of these special forest lands. I encourage you to adopt Alternative E which restricts
motorized use in roadless areas on the Forest and the Caples Creek Proposed Wilderness area.

Commenter 243, 247, 249, 254

Response: The regulations for management of IRAs (36 CFR 294) do not preclude the use of motor vehicles for remote recreation. The preamble to the regulations states that the prohibition of road construction, road reconstruction and timber harvesting is considered to protect the values and characteristics of IRAs. Chapter 3 displays a comparison of the effects between the different alternatives on the IRA values established in the regulations. This comparison shows that there is little difference between the different action alternatives other than Alternative E. There are portions of the IRAs where the ENF LRMP has established Management Area prescriptions which do not allow for motor vehicle use (Primitive and Semi-Primitive Nonmotorized Management Areas). None of the action alternatives allow for wheeled motor vehicle use within any of these areas.

2. I am disappointed to see the Forest Service's preferred alternative included numerous motorized routes in roadless areas. I urge the Service not to designate the following routes: 11N26F, 17E24, 17E21, 17E19 or any other motorized routes in Inventoried Roadless Areas.

Roads and motorized trails are known to contribute to the spread of noxious weeds, another of the identified threats.

Commenter 47, 246, 346, 350, 367, 381, 888, 892, 894, 895, 896, 897, 898, 900, 1032, 1034

Response: Various commenters identified that they feel that wheeled motor vehicle use should not be allowed in IRAs to avoid further habitat fragmentation, and to avoid the spread of nonnative invasive plant species and that IRAs should be managed for "quiet" non-motorized forms of recreation. The regulations for management of IRAs do not preclude the use of motor vehicles for remote recreation. The preamble to the regulations states that the prohibition of road construction, road reconstruction and timber harvesting is considered to protect the values and characteristics of IRAs. Chapter 3 displays a comparison of the effects between the different alternatives on the IRA values established in the regulations. There are portions of the IRAs where the ENF LRMP has established Management Area prescriptions which do not allow for motor vehicle use (Primitive and Semi-Primitive Nonmotorized Management Areas). None of the action alternatives allow for wheeled motor vehicle use within any of these areas.

3. DEIS should not reject a popular OHV routes because it is in an "inventoried roadless area" as in the case *Wilderness Society v. USFS*, the Wilderness Society successfully argued before the court "the Roadless Rule does not close any existing vehicular routes in any National Forest roadless areas...the Roadless Rule prevents only road construction or reconstruction and timber cutting, sale, or removal in IRAs"

Commenter 334, 385

Response: As described in Chapter 3, the Forest Service issued new regulations for the protection of IRAs in 2001, prohibiting the construction of new roads, reconstruction of existing roads, with some exceptions, and prohibiting timber harvesting (36 CFR 294 Subpart B). These regulations do not modify the land management allocations, prescriptions, or standards and guidelines as established in the ENF LRMP, other than to prohibit road construction, reconstruction and timber harvesting. The regulations do not require the closure of existing NFS roads (Fed Reg V66, N0. 9 p 3249). The IRA values and characteristics, outlined in the regulations include "primitive, semi-primitive nonmotorized and semi-primitive motorized classes of dispersed recreation" and "other locally identified unique characteristics" (36 CFR 294.11; emphasis added). The preamble to these regulations specifically recognizes that IRAs are important in providing remote recreation opportunities, without the activity restrictions of Wilderness, including off highway vehicle use (Fed Reg V66, No. 9, p 3267). FS regional direction (letter dated November 28, 2007) reemphasized the direction that the regulations do not prohibit wheeled motor vehicle use within IRAs, nor do they require the closure of existing NFS roads. Based on public comments and issue development after the release of the Notice of Intent for this Travel Management analysis, a range of alternatives were developed that included one alternative to not allow any public wheeled motor vehicle use within the IRAs. Other alternatives allowed for a range of motor vehicle use for remote recreation purposes. The effect on the IRA characteristics from implementing each of these alternatives is presented in Chapter 3, using the four indicator measures. The comparison of effects will be used by the Forest Supervisor in making a decision.

4. No routes in Inventoried Roadless Areas, Recommended Wilderness or Potential Wilderness should be designated; We are opposed to the designation of routes in Inventoried Roadless Areas; IRAs overlap lands designated as Old Forest Emphasis Areas; they provide quiet recreation opportunities for non-motorized recreationists and protect the roadless quality for future wilderness designations. IRAs provide refuge for many wildlife species; and relieve hunting pressures; these areas include red fir and lodge pole pine types that are preferred

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habitat for marten in the Sierra Nevada (USDA FS 2001a) and increase the size and connectivity of undisturbed habitat that occurs in the wilderness areas. (DEIS, p. 178). On the ENF, the Wilderness experience is rationed in order to protect a resource that is in high demand but in short supply. These IRAs can provide a wilderness-type experience for the thousands of people who seek quiet, isolation and nature in a relatively unmodified condition.

Commenter 389, 635

Response: Various commenters identified that they feel that wheeled motor vehicle use should not be allowed in IRAs to avoid further habitat fragmentation, and to avoid the spread of non-native invasive plant species, and that IRAs should be managed for "quiet" non-motorized forms of recreation. The regulations for management of IRAs do not preclude the use of motor vehicles for remote recreation. The preamble to the regulations states that the prohibition of road construction, road reconstruction and timber harvesting is considered to protect the values and characteristics of IRAs. Chapter 3 displays a comparison of the effects between the different alternatives on the IRA values established in the regulations. This comparison shows that there is little difference between the different action alternatives. However, there are portions of the IRAs where the ENF LRMP has established Management Area prescriptions which do not allow for motor vehicle use (Primitive and Semi-Primitive Nonmotorized Management Areas). None of the action alternatives allow for wheeled motor vehicle use within any of these areas.

One of the values of IRAs is for motorized and non-motorized remote recreation, and to provide areas where this recreation experience can be found without the activity restrictions of Wilderness. The ENF LRMP has established certain areas for Primitive and Semi-Primitive Nonmotorized opportunities in order to meet the demand for these types of experiences.

5. Since the roadless rule only prevents road construction or reconstruction in IRAs, it should not be used to decide if ORV routes are not designated in IRAs. Please include in the final decision 17E51, 17E20, 17E71, 11N40B, NST1752A, NSR1016AA, NST1763A.

Commenter 385, 386

Response: Allowing continued wheeled motor vehicle use within IRAs is not inconsistent with the regulations regarding roads within IRAs. Semi-primitive motorized recreation is one of the characteristics recognized in the national regulations (36 CFR 294). However, the definition of road construction in the Roadless Rule regulations specifies that the addition of unauthorized routes to the National Forest transportation system as roads is considered new construction (36 CFR 294.11) and therefore would be prohibited. The regulations also allow motorized use of trails to continue, and do not prohibit the addition of trails to the National Forest transportation system. Some of the existing NFS roads, NFS trails and unauthorized routes within IRAs provide access to remote recreation opportunities, or provide a remote recreation opportunity. A range of alternatives were developed for this Travel Management analysis, including one alternative to not allow any public wheeled motor vehicle use within the IRAs. Other alternatives allowed for a range of motor vehicle use for remote recreation purposes. The effect on the IRA characteristics from implementing each of these alternatives is presented in Chapter 3, using the four indicator measures. The comparison of effects will be used by the Forest Supervisor in making a decision.

The specific routes listed in the comment are within an area recommended in the ENF LRMP for Wilderness designation. The area has not been congressionally designated yet. FS direction is to manage the area to not reduce the wilderness potential of the area and to not compromise the wilderness values of the area. The Forest Supervisor decided to not designate some of the routes listed because they are within meadows and the intent of the LRMP decision is to manage the area for wilderness values such as high quality meadow

habitats. The remaining routes were not designated because they were not accessible, or no longer made for a logical loop. Modified B will allow motorcycle and other public motor vehicle use on other high country routes, such as in the Squaw Ridge area.

6. The 2001 Roadless Rule recognizes that pre-existing routes would be open to motorized travel. The DEIS has not addressed the Roadless issue sufficiently;

### Commenter 64, 891

Response: There are nine inventoried roadless areas (IRAs) on the ENF which are described in Chapter 3 of the FEIS. As described in Chapter 3, the 2001 regulations for the protection of IRAs prohibited the construction of new roads, reconstruction of existing roads, with some exceptions, and prohibition of timber harvesting (36 CFR 294 Subpart B). These regulations do not modify the land management allocations, prescriptions, or standards and guidelines as established in the ENF LRMP, other than to prohibit road construction, reconstruction and timber harvesting. The regulations do not require the closure of existing NFS roads (Fed Reg V66, No. 9 p 3249), nor do they prohibit the closing of roads. The IRA values and characteristics, outlined in the regulations include "primitive, semi-primitive nonmotorized and semi-primitive motorized classes of dispersed recreation" and "other locally identified unique characteristics" (36 CFR 294.11; emphasis added). The preamble to these regulations specifically recognizes that IRAs are important in providing remote recreation opportunities, without the activity restrictions of Wilderness, including off highway vehicle use (Fed Reg V66, No. 9, p 3267). The preamble also differentiates between a road and a motorized trail, and does not preclude the construction, reconstruction or maintenance of motorized trails (including those over 50 inches wide)(Fed Reg V66, No. 9, p 3251). FS regional direction (letter dated November 28, 2007) re-emphasized the direction that the regulations do not prohibit wheeled motor vehicle use within IRAs, nor do they require the closure of existing NFS roads. Based on public comments and issue development after the release of the Notice of Intent for this Travel Management analysis, a range of alternatives were developed that included one alternative to not allow any public wheeled motor vehicle use within the IRAs. Other alternatives allowed for a range of motor vehicle use for remote recreation purposes. The effect on the IRA characteristics from implementing each of these alternatives is presented in Chapter 3, using the four indicator measures. The comparison of effects will be used by the Forest Supervisor in making a decision.

7. Many modifications are suggested in multiple sentences in Chapter 3 of the DEIS regarding the Indicator Measures and effects analysis for IRAs; p.xxv Inventoried Roadless Areas sentence, "This Alt. has the greatest potential for impacts on IRA's characteristics..." is an inflated statement and no alt will realistically have cross country travel

### Commenter 461

Response: Thank you for your comment. One suggested edit was to change the metric in Indicator Measure 3 from miles of roads or trails to number of 7<sup>th</sup> field watersheds. This suggestion was not adopted because the suggested unit of measure was not considered to be an appropriate measure, and would not reflect differences between alternatives as well. The number of 7<sup>th</sup> field watersheds affected would provide a sense of distribution of the roads or trails within the IRAs, but would not express the magnitude of differences between alternatives. The affected environment section in Chapter 3 of the FEIS describes the distribution of the roads and trails, as do the alternative maps. Some of the other suggested edits to the effects analysis were not incorporated because the text adequately reflected the results of the analysis.

In response to the statement, "This Alternative has the greatest potential for impacts on IRA's characteristics...", the FEIS compares the effects between alternatives particularly regarding

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the impacts to water quality, semi-primitive recreation, continued fragmentation of mature forest habitat, and the potential for the spread of noxious weeds. The basis for this statement is provided in the IRA section of Chapter 3, where it is shown that Alternative A has a higher amount of mature forest fragmentation than the other alternatives, particularly in the Caples Creek, Dardanelles, Pyramid, Raymond Peak, Rubicon and Tragedy-Elephants Back IRAs. The analysis also shows that Alternative A has a higher number of miles of native surface roads and trails, which lead to increased runoff and the potential for increased erosion and sedimentation.

8. The FS cannot impose blanket restrictions on mechanized access in IRAs solely by virtue of their IRA status. These areas should remain accessible/maintained consistently with the Wilderness Act and other laws

Commenter 360, 385

Response: Thank you for your comment. As described in Chapter 3, the Forest Service issued new regulations for the protection of IRAs in 2001, prohibiting the construction of new roads, reconstruction of existing roads, with some exceptions, and prohibiting timber harvesting (36 CFR 294 Subpart B). These regulations do not modify the land management allocations, prescriptions, or standards and guidelines as established in the ENF LRMP, other than to prohibit road construction, reconstruction and timber harvesting. The regulations do not require the closure of existing NFS roads (Fed Reg V66, N0. 9 p 3249). The IRA values and characteristics, outlined in the regulations include "primitive, semi-primitive nonmotorized and semi-primitive motorized classes of dispersed recreation" and "other locally identified unique characteristics" (36 CFR 294.11). The preamble to these regulations specifically recognizes that IRAs are important in providing remote recreation opportunities, without the activity restrictions of Wilderness, including off highway vehicle use (Fed Reg V66, No. 9, p 3267). FS regional direction (letter dated November 28, 2007) re-emphasized the direction that the regulations do not prohibit wheeled motor vehicle use within IRAs, nor do they require the closure of existing NFS roads. Based on public comments and issue development after the release of the Notice of Intent for this Travel Management analysis, a range of alternatives were developed that included one alternative to not allow any public wheeled motor vehicle use within the IRAs. Other alternatives allowed for a range of motor vehicle use for remote recreation purposes. The effect on the IRA characteristics from implementing each of these alternatives is presented in Chapter 3, using the four indicator measures. The comparison of effects will be used by the Forest Supervisor in making a decision.

9. IRAs should be protected to prevent habitat fragmentation;

Commenter 873

**Response:** Thank you for your comments.

10. Designate 72" trails in IRAs so they may continue to be enjoyed by 4x4s, ATVs, and motorcycles.

Commenter 1082

Response: Thank you for your comment. Based on public comments and issue development after the release of the Notice of Intent for this Travel Management analysis, a range of alternatives were developed that included one alternative to not allow any public wheeled motor vehicle use within the IRAs. Other alternatives allowed for a range of motor vehicle use for remote recreation purposes. The effect on the IRA characteristics from implementing each of these alternatives is presented in Chapter 3, using the four indicator measures. The comparison of effects will be used by the Forest Supervisor in making a decision.

11. FS must properly and effectively manage OHV's in non-wilderness areas, including proposed

or recommended wilderness areas until Congress has made a Wilderness status determination Commenter 360

Response: The Implementation Strategy outlined in Chapter 2 of the FEIS describes the direction to develop maps, signs and other products to explain the rules to the public, along with efforts to educate Forest visitors of the rules and enforce those rules. The regulations for management of IRAs do not preclude the use of motor vehicles for remote recreation. However, there are portions of the IRAs where the ENF LRMP has established Management Area prescriptions which do not allow for motor vehicle use (Primitive and Semi-Primitive Nonmotorized Management Areas). None of the action alternatives allow for wheeled motor vehicle use within any of these areas.

A large portion of the Caples Creek IRA is within a management Area recommended for Wilderness designation in the ENF LRMP. As such, that portion of the Caples Creek IRA has additional management direction applied to it. National direction for management of recommended wilderness areas states in part that "(a)ctivities currently permitted may continue, pending designation, if the activities do not compromise wilderness values of the area" (FSM 1923.03). The analysis of these effects is described in the Wilderness section of Chapter 3 of the FEIS.

# **Inventoried Roadless Area (Specific)**

1. The proposed Caples Creek Wilderness, supported by the FS needs to be closed to ORVs, specifically routes 10N14, 10N14B and unnumbered spur, and 17E17. All ORV routes through the five other "inventoried roadless areas" should be closed and restored to nature. Alternative E closes all these routes.

Commenter 173, 174, 175

Response: Thank you for your comment. A large portion of the Caples Creek IRA is within a Management Area recommended for Wilderness designation in the ENF LRMP. The routes mentioned in this comment are outside of the area recommended for Wilderness. They are not proposed to be open to motor vehicle use in Alternative E, and the effects are described in Chapter 3 of the FEIS.

2. Want to see routes closed thru the Caples Creek Proposed Wilderness. We also favor Alternative E for barring OHV traffic from Dardanelles, Fawn Lake, Pyramid, Raymond Peak, and Tragedy-Elephants Back roadless areas.

### Commenter 179

**Response:** Thank you for your comment. Allowing continued wheeled motor vehicle use within IRAs is not inconsistent with the regulations regarding roads within IRAs. Many of these routes within the listed IRAs are existing NFS roads or trails that provide access to remote recreation opportunities, or which themselves provide a remote recreation opportunity. Semi-primitive motorized recreation is one of the characteristics recognized in the national regulations (36 CFR 294).

3. 11N26F, 17E24, 17E21, 17E19 need to not be designated; only Alt E eliminates motorized use in the IRAs

Commenter 47, 346, 350, 367, 381, 888, 892, 894, 895, 896, 897, 898, 900

**Response:** Thank you for your comments.

## Law Enforcement

1. Motorized users utilize areas reserved for non-motorized uses. Therefore, heightened law

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enforcement will be necessary for implementation. How will this be funded?

Commenter 65, 208, 350, 363, 382, 384, 633, 739, 854

**Response:** Thank you for your comment. The Forest will continue to use available funding to enforce the system and will seek additional funding opportunities whenever possible. For example, the Forest has been successful in receiving OHV law enforcement grants from the state.

2. Much off trail use by OHVs comes from hunters, not the OHV recreation public. Ca. Dept. of Fish and Game needs to enforce existing laws by their own clientele, not try to restrict legitimate use by the general public.

Commenter 383

**Response:** Thank you for your comment.

3. Due to lack of funding there are not enough rec-techs to make sure OHVs stay on the existing roads. The more roads and trails that are open to motor vehicles, the more difficult and expensive it is to police their activities.

Commenter 787, 1050, 1053

**Response:** The Forest will use the current law enforcement and forest protection officers on the Forest to enforce the designated route system, as well as continue to coordinate with county sheriffs and other local law enforcement. The Forest will continue to assess our needed workforce, and will seak additional funding opportunities in the future.

4. A vehicle being away from a campsite could result in vandalism and break-ins.

Commenter 320, 439, 747, 764

Response: Thank you for your comment. Limiting vehicles to one vehicle length from the edge of the route provides a guideline for differentiating between parking on the system and driving cross-country and is the currently proposed FS national policy. Based on public input on the DEIS, Alternative B was modified and a number of roads are included which provide access to dispersed camping areas. Regional guidance regarding cross country travel for dispersed camping has been developed, and following the release of the Final EIS and Record of Decision, additional analysis for designating public motor vehicle use of dispersed camping areas will be conducted.

5. If FS closes the trails, the people who used this public land will be more tempted to go on state or private property;

Commenter 320, 439, 764

**Response:** Thank you for your comment.

6. Incorporate a point system for motor vehicle operators who cause resource damage. After accumulating a certain number of points, the operators green sticker is confiscated.

**Response:** Thank you for your comment. The State of California OHV Division manages the green sticker program. The ENF does not have the authority to institute a point system on a State run program.

7. Citations issued for being on a trail that is closed on the map, but not signed closed, will not hold up in court. The solution is to sign 'closed' on the trail citations will be issued on.

Commenter 386, 654

**Response:** Thank you for your comment. The Travel Management Rule contains a prohibition at 36 CFR 261.13 that pertains to motor vehicles. Under the provision, after NFS roads and trails are designated pursuant to 36 CFR 212.51, it is prohibited to possess or operate a motor vehicle not in accordance with those designations. In other words, a citation can be

issued for operating a motor vehicle on a trail that is not designated for public wheeled motor vehicle use.

8. Law enforcement section needs a much higher level of detail. There are few specifics and insufficient analysis to discuss how existing route management is affected by enforcement and education. Document must add details on how the five LEO positions have been staffed, what portion of their time is spend focused on OHV-related activities.

Commenter 64, 240, 293, 363, 378, 384, 739, 854, 879

**Response:** Enforcement will continue to be a challenge, but it is expected that having a designated route system with quality maps and signing will help significantly. Public education will also be critical and the Forest is looking at ways to improve outreach and education efforts and use public volunteers and partners to help educated forest users about the new rules and the importance of following them.

9. There are problems because there is lack of management and education [by the FS]; the public needs to be educated on minimal impact methods of enjoying the outdoors

Commenter 282, 288

**Response:** The Implementation Strategy in Chapter 2 of the FEIS includes elements to develop a public education strategy which among other tasks, will work to educate forest users about the potentially negative effects of their activities, and to discuss how the public can help with implementation of the designated system, enforcement of the rules, and education of other forest users. A major aspect of the education and outreach program will be to convey the new rules and the importance of following them to the public.

10. Education and enforcement are necessary. Provide interpretive programs, create awareness of resource fragility

Commenter 369, 424

**Response:** The Implementation Strategy in Chapter 2 of the FEIS includes elements to develop a public education strategy which among other tasks, will work to educate forest users about the potentially negative effects of their activities, and to discuss how the public can help with implementation of the designated system, enforcement of the rules, and education of other forest users. A major aspect of the education and outreach program will be to convey the new rules and the importance of following them to the public.

11. It would help to have stricter, but reasonable rules.

Commenter 240, 293

**Response:** Thank you for your comment.

12. Closing trails and routes will only lock out responsible OHV users, because the ones who cause problems already have a lack of respect for the rules and regulations.

Commenter 177, 234, 320, 439, 764

**Response:** Thank you for your comment. The Implementation Strategy in Chapter 2 of the FEIS includes elements to develop a public education strategy which among other tasks, will work to educate forest users about the potentially negative effects of their activities, and to discuss how the public can help with implementation of the designated system, enforcement of the rules, and education of other forest users. A major aspect of the education and outreach program will be to convey the new rules and the importance of following them to the public. The failure to follow the rules could result in fines, the loss of riding privileges and the closure of routes or areas to public wheeled motor vehicles.

13. Consider better law enforcement instead of closing trails so that responsible ATV users are not punished.

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Commenter 780

**Response:** Thank you for your comment.

14. Shutting down the forest will make crime rates go up due to boredom.

Commenter 262

Response: Thank you for your comment.

15. Consider implementing quotas, monitor use heavily, and recognize critical role of enforcement.

Commenter 419

Response: Thank you for your comment. The Forest Supervisor has decided that he is not interested in implementing a quota or permit system to regulate public wheeled motor vehicle use on the Forest. The monitoring and implementation strategy in Chapter 2 of the FEIS explains the level of monitoring that we feel the new system will require. Implementation will involve the use of Forest Protection Officers and Law Enforcement Officers to enforce the new rules plus an education and outreach program that will explain the new rules and the importance of following them to the public.

16. The FS and OHV enthusiasts, together with their increasing effort, have monitored and protected the environment from uninformed individuals.

Commenter 234

**Response:** Thank you for your comment.

17. Do not create a system which cannot be monitored, managed, restored and regulated adequately by forest personnel.

Commenter 421, 427

Response: Thank you for your comment. One of the evaluation criteria in the Travel Management Rule for designating roads and trails is the consideration of the need for maintenance and administration of roads, trails, and areas that would arise if the uses under consideration are designated; and the availability of resources for that maintenance and administration (36 CFR 212.55(a)). According to the Law Enforcement analysis in Chapter 3 of the FEIS, the designation of less mileage of roads and trails, compared to the current system, will allow Forest Protection Officers and Law Enforcement Officers to more strategically focus enforcement on open routes to prevent route proliferation and resource damage off of these routes, while still providing for education, information, and public safety.

18. I disagree that any area, road, trail or route should be made off-limits to the public based on lack of funds for maintenance or law enforcement.

Commenter 1052

**Response:** The Travel Management Rule states the evaluation criteria that the Forest Supervisor needs to consider when designating roads, trails, or areas on NFS lands. Among them are public safety and the need for maintenance and administration of roads, trails, and areas that would arise if the uses under consideration are designated; and the availability of resources for that maintenance and administration (36 CFR 212.55(a))

19. A ranger named Jack Placchi told users that he was closing trails in the Rock Creek area because he could not personally patrol them. All of these trails should be reopened because this is not good reasoning for closing trails.

Commenter 1030

**Response:** The trails in the Rock Creek area have been managed separately from the rest of the Forest since 1987 and have been analyzed under a separate EIS. Since this area is managed under a separate NEPA decision, it is not part of this analysis.

20. Closure will result in abuse. Abuse to the structures which will keep users our, i.e. gates, fences, and signs. In addition, we, the tax payers will then have to deal with paying for you, the bureaucrats to then fix these items.

#### Commenter 67

**Response:** The Implementation Strategy in Chapter 2 of the FEIS includes elements to develop a public education strategy which among other tasks, will work to educate forest users about the potentially negative effects of their activities, and to discuss how the public can help with implementation of the designated system, enforcement of the rules, and education of other forest users. A major aspect of the education and outreach program will be to convey the new rules and the importance of following them to the public. The failure to follow the rules could result in fines, the loss of riding privileges and the closure of routes or areas to public wheeled motor vehicles.

# **Maintenance Level Roads**

1. The Notice of Intent states, "Maintenance level 2 forest roads will generally be designated as open to green sticker OHV use unless adverse environmental impacts or conflicts with other uses are identified". The proposed alternative reveals that the above statement is not adhered to at all. Examples: Union Valley Reservoir, Silverfork Road, and Bear River Reservoir. Thus the purpose and need is not answered by the DEIS. Thus the chosen alternative must generally have ML2 roads open to OHV use and since no adverse environ impacts or conflicts with other users are specifically cited in this document, ALL must have OHV use permitted unless a site specific report is obtained.

Commenter 346, 531, 601, 1059

**Response:** Alternative B was modified to address this comment. Modified B allows use by street legal and OHV on all but 34 miles of ML-2 roads.

2. Many routes were not adequately analyzed because of conflicts with S&Gs in the LRMP. Rview all open routes that were disqualified by S&G's and amend the LRMP unless there is definitive information specific to the ENF to support the S&G's. For example, the ENF failed to complete analysis to support seasonal closures in deer winter range.

### Commenter 383

- **Response:** Appendix F contains the rationale for disqualifying routes by standard and guidelines for Modified B. Two standards and guidelines were amended to reflect where routes are inconsistent. Decisions to close routes were not made based on the standard and guideline for trail density in deer winter range.
- 3. Do not add ML 1 roads to the motorized trail system. These roads were not designed for permanent use, especially by off-road vehicles, and are likely to cause significant damage and alter runoff patterns. They should be restored to their pre-project condition as soon as possible.
- Commenter 47, 246, 337, 362, 367, 417, 419, 641, 646, 873, 882, 892, 894, 895, 896, 897, 898, 900, 1032
- **Response:** The Forest Service agrees that the ML-1 roads were originally designed and constructed to be intermittent service roads and were generally intended to be closed to public wheeled motor vehicle use. However, a majority of them are no longer physically closed. Over the years, public use on these roads has occurred, and the public has come to

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view them as part of the available National Forest transportation system. Modified B contains ML-1 roads that are consistent with ENF LRMP standards and guidelines and enhance recreation experience by connecting routes or areas, provide access to an area of interest, or allow access to dispersed camping. These ML-1 roads will be upgraded to ML-2 roads.

4. If road closures are partly due to low funding to maintain, where does all the money come from to move boulders, install gates, and bulldoze to close roads come from?

Commenter 728, 824

Response: The Eldorado National Forest's budget is based on a number of factors. Federal funding for the management of the Forest is based on funding approved by Congress for a variety of activities, such as fire hazard reduction, wildlife management, vegetation and soil management as well as recreation management. Funds appropriated by congress generally can only be used for the purposes set by congress, such that funding for wildlife management cannot be used for maintaining recreation trails. Funding to the forest Service is distributed by various formulas from the national level and regional level. The Forest also utilizes other funding sources, such as collection agreements, grants, and certain recreation fees collected.

5. Support an increase in funding for trail maintenance and decrease in funding for land restoration.

Commenter 879

Response: Thank you for your comment.

6. FS already doesn't maintain existing roads, this is not a reason to close them Commenter 728, 747

**Response:** Thank you for your comment.

7. We question the accuracy of some of these assumptions on page 48. One particularly troubling assumption is: "NFS roads and trails are in an acceptable condition, unless information exists to the contrary. This statement is unsupportable and flies in the face of the deferred maintenance log of over \$32 million

Commenter 389

**Response:** Thank you for your comment. System roads and trails typically have been designed and constructed in conformance with common engineering practices. The design and the construction standards are done with the input of resource specialists, and comply with Best Management Practices (BMP). Therefore, we start with the assumption that these roads and trails have been adequately constructed to an acceptable condition.

The Deferred Maintenance on a road or trail increases when the available funding isn't adequate to accomplish the Annual Maintenance needed. However, Annual Maintenance is a calculated number and is based on several assumptions. One assumption is the expected design life of individual components of a road, whether those components are culverts, signs or the paved surfacing. There is only a loose correlation between Deferred Maintenance and whether a road or trail is in acceptable condition. If a culvert has a design life of 20 years and it is not replaced at the end of its design life, then the replacement cost is considered to be Deferred Maintenance. The culvert may continue to function adequately despite the increase in calculated Deferred Maintenance.

The Washington Office each year sets a minimum level of review that each Forest must meet by conducting Condition Surveys. These surveys are used to calculate the Annual Maintenance needs on a particular road or trail. However, this isn't the only source of information on the condition of our roads or trails. The Forest has 679 miles of ML 3, 4 and 5 roads on the

system. These roads are heavily used by the public, by our cooperators and by Forest employees. When a problem is found on one of these roads, that information is reported back to us so that it can be fixed. Although our ML 2 roads do not receive the same level of use, we also hear of any problems that are found on them.

Repairs to the road system are accomplished in a number of ways- some are dealt with through the Timber Sale process, some qualify for ERFO funding from Federal Highways, and others are repaired with appropriated funds. Whenever we have a large forest fire in an area, we also request funds to increase the level of monitoring on the roads through the burned area. We routinely patrol these roads because we know that they are more susceptible to damage from winter storms.

In summary, we believe our system roads and trails have been built using good design and construction practices, and that we are alerted when an issue is identified that requires action to correct it. We acknowledge that we need to put more effort into a formal monitoring of the road and trail system, and we are proposing to do that in the FEIS.

8. Signage costs may be exorbitant. Consider maps with detailed restriction information to cut implementation costs

Commenter 417

Response: Thank you for your comment.

9. Why should we determine which trails stay open and which do not? Why not take these dollars and direct them toward repair or upgrading the resourcing of the current trail system?

Commenter 70

**Response:** Thank you for your comment. The national Travel Management Rule requires the prohibition of cross-country travel and designating roads and trails for public wheeled motor vehicle use. This Environmental Impact Statement displays the possible adverse effects of implementing each alternative, as required by the National Environmental Policy Act.

10. There has never been a road (or area) used for off-roading (ORV) that has not been severely damaged as a consequence.

Commenter 254

Response: Thank you for your comment.

11. As you deliberate on which routes to designate, please be careful NOT to allow more routes than you have enough money and staff to manage and enforce -- to monitor and if needed, restore damage. This is crucial.

Commenter 229

**Response:** Thank you for your comment. The Travel Management Rule requires the Forest Supervisor to consider the cost of maintaining the designated route system.

# Map Concerns

1. ENF should provide a Winter Route Map that specifically identifies: all routes proposed for designation; all to be open & closed during the seasonal closure period; all to be open & closed to OHV over the snow travel; all snowmobile and cross-country routes;

Commenter 379, 461

**Response:** The Implementation Strategy discusses two different maps that will be produced following the selection in the ROD. One map is the motor vehicle use map (MVUM) which will follow the national Forest Service standards that indicate which routes are open to the public by class of vehicle per route and season open for use. The other map is a local travel

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map that will follow the production of the primary MVUM and will indicate which routes are designated open to the public by class of vehicle per route and season open for use, and identify other important features on the Forest that will help the public navigate the system.

2. Provide the public with accurate maps and up to date information.

Commenter 204

**Response:** It is the intention of the Forest Service to continue to keep the public informed of the status of the project and decision as described in the Implementation Strategy in Chapter 2 of the FEIS.

3. Maps provided in DEIS are miserable, cannot be easily read or understood. Unrealistic to expect public to review these maps and generate coherent comments

Commenter 637

**Response:** Thank you for your comment. The Forest will work with the public in the development of the local travel map.

4. A new FS map each year is unnecessary. You can't expect the public to get a new map every year. The map should be good until items on the map are changed.

Commenter 64

**Response:** Thank you for your comment. The Travel Management Regulations require that a new map be produced yearly so that changes to the designated route system can be made. In the past, the Forest has produced updated travel maps on a regular basis and made these maps available to the public.

5. The Motor Vehicle map needs landmarks, streets, highways, rivers, cities/towns.

Commenter 386, 654

**Response:** Thank you for your comment. In addition to the Motor Vehicle Use Map, which is intended to be the enforcement tool of the Travel Management Regulations, the ENF will develop a travel map that clearly shows the routes open to public use and which identifies other important features to help the public locate themselves and navigate the Forest, as described in the "Implementation Strategy" section of Chapter 2 of the FEIS.

6. Provide forest map showing maintenance levels. Consider maps showing differences between pairs of alternatives for comparison.

Commenter 417

**Response:** Thank you for your comment. Due to time and resource constraints, the Forest is not able to produce the maps identified.

7. The maps would be a little more useful if the roadless and wilderness areas were overlaid on top.

Commenter 3

**Response:** Thank you for your comment. The existing wilderness areas are shown on the alternative maps.

8. I feel that we should have two sets of maps. One for the public, that has the roads that are legal to travel on, and a set for the agency that has all the roads on it for fire suppression and administrative purposes.

Commenter 56

**Response:** Thank you for your comment. This Travel Management project addresses public wheeled motor vehicle use. Maps needed for administrative purposes are outside the scope of this project.

9. Known errors in the maps in the DEIS. All known errors should be corrected and made public before any final decisions are made based on this information.

Commenter 231, 436, 439, 601, 731, 786, 801, 1028, 1046

**Response:** All known errors have been corrected in the FEIS.

10. The trail from the top of Hunters Trail at Hell Hole Res. connecting to Nevada Point Ridge, 14N07, is missing from the map.

Commenter 385, 386

**Response:** 14N07 is on the map but it does not connect the top of Hunter's Trail to Nevada Point Ridge.

11. Hunsucker Trail is missing from map

Commenter 385

**Response:** Thank you for the information.

12. Deer Creek Trail, 14E11, is not mapped correctly.

Commenter 385, 386

Response: Thank you for your comment.

13. The map showing all of the trails on the ENF is not complete, particularly in the Rock Creek area.

Commenter 1030

Response: The Rock Creek Recreational Trails area is outside the scope of this analysis.

14. The maps show a break in the road from Ellis Creek where it crosses Wentworth Springs, Rubicon Springs county road to McKinstry Lake. This break is an obvious error in your maps since it has been on the maps at least since 1955. Without proper and accurate documentation the entire DEIS plan should be stopped and re-evaluated.

Commenter 204, 825

**Response:** NFS road 14N05, which passes by McKinstry Lake, does not cross Ellis Creek but stops at a landing north of the creek. An unauthorized route has been created that connects NSF road 14N34B and 14N05. 14N34B does connect with County Road 63, the Rubicon Trail.

15. In Alternatives B-E, near where Rubicon Trail crosses Ellis Creek, the maps are missing segments of 14N34B- allows access to well-established dispersed camping near Ellis Creek. 14N05 and 14N34B are not connected over the section of SPI land, even though clear historical precedent exists to perfect this route as a public easement; the routes connecting to McKinstry Lake and Ellis Creek need to be designated for further administrative review, and not acted upon with the route designation process

Commenter 378

**Response:** NFS road 14N05, which passes by McKinstry Lake, does not cross Ellis Creek but stops at a landing north of the creek. An unauthorized route has been created that connects NSF road 13N34B and 14N05. 13N34B does connect with County Road 63, the Rubicon Trail.

16. In Alts B-E, right near the base of the second Loon Lake Dam, the maps show the wrong route through the Fox-Wheeldon property, on Alt A the route is shown as NSRELD-147-P, the correct route appears to be NSRELD-147-D-N in place of D will not work...;

Commenter 378

**Response:** Thank you for the information.

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17. In Alts B-E, east of Spider Lake, the maps are missing a segment of a well-established bypass around Old Sluice just north of Spider Lake- this is a route the County, FS, and the private property owners have helped maintain, it is a County claim which doesn't really fit into the route designation process

Commenter 142, 231, 288, 303, 378, 379, 620, 648, 649, 786

**Response:** Thank you for the information. Routes on private land are not shown, other than NFS roads or trails and the County road referred to as the Rubicon Trail.

18. Becker Ridge Trail at Echo does not appear on maps

Commenter 142, 288, 378, 379, 620, 648, 649

**Response:** Thank you for the information. The Implementation Strategy provides for a process to work with the public to consider the addition of routes or changes in management of the designated system in the future. This route could be brought forward as a part of that process.

19. Map omission: 14N27 should connect with 14N60. Because it does not show on map, it creates an island out of 14N60, 14N51, 14N51A and 14N51B

Commenter 397

Response: Thank you for the information. NFS road 14N60 was originally constructed as an intermittent service road (ML-1) and was intended to be closed to public motor vehicle use. This road was not proposed to be designated in the different action alternatives. A portion of this road is within a meadow, and LRMP direction is to close roads through meadows. Roads 14N51, 14N51A and 14N51B are proposed to be open in Modified B.

20. Alternative D show a complete omission of trails above the Bunker Hill Lookout which are 14N27, 14N27C, 14N27K, 14N27D, 14N27E and the unnumbered route to the Little Meadow

Commenter 397

**Response:** Thank you for the information. The various alternatives were developed to respond to the significant issues raised during the initial public scoping and the purpose and need stated in Chapter 1 of the FEIS. NFS roads 14N27C, 14N27D, and 14N27E were originally constructed as an intermittent service road (ML-1) and were intended to be closed to public motor vehicle use. Appendix G of the FEIS displays the considerations between resource concerns and recreation opportunities or public access for ML-1 roads.

21. It is difficult to read the maps. Show where these roads connect off of the ENF. Provide paper maps to make this clearer.

Commenter 1041

Response: Copies of the maps for the FEIS will be available on the ENF website and paper copies will be available for review at all of the district offices and the Supervisors Office. The versions of the maps on the CD allow the viewer to see more detail on the maps, due to the limitation on size of the paper map. This Travel Management project pertains to public wheeled motor vehicle use on the ENF, and so the maps have been limited to showing the routes under the jurisdiction of the Forest Supervisor, to the greatest extent possible. In the Implementation Strategy in Chapter 2 of the FEIS, direction is provided to produce a local travel map that will allow Forest visitors to navigate the public transportation system.

22. Old Sluice, all historic access roads left off map: maintain access

Commenter 537, 538

**Response:** Thank you for the information.

23. Use interactive maps so users can give feedback on trail characteristics

Commenter 654

**Response:** Thank you for your suggestion. The Implementation Strategy in Chapter 2 of the FEIS describes the efforts the Forest will undertake to work with the public to provide public education and information. This suggestion will be considered at that time.

24. Road to Tells Creek campground no longer on Alt E map; Street Legal road only does not extend far enough

Commenter 349, 375

**Response:** Thank you for the information. This road was inadvertently missed in our National Forest Transportation System database. This road has been shown in Modified B as open to highway legal vehicles to the trailhead and campground.

25. Distinction between primary MVUM map and subsequent local travel map unclear.

Commenter 417

Response: The Implementation Strategy discusses two different maps that will be produced following the selection in the ROD. One map is the motor vehicle use map (MVUM) which will follow the national Forest Service standards that indicate which routes are open to the public by type of vehicle per route (motorcycle, ATV, 4WD, passenger vehicle, etc.) and season open for use. The other map is a local travel map that will be designed to better meet the Forest visitor's needs and to allow the visitor to more easily navigate the Forest's open transportation system. The local travel map will indicate which routes are designated open to the public by type of vehicle per route and season open for use, and identify other important features or landmarks on the Forest.

## **Meadows**

1. OHVs can trample a beautiful meadow. Look at Camp Camino in Union Valley. In July, someone went through a fence to camp on the lake and it opened up the area for many others in his path and the destruction was immense.

Commenter 781

**Response:** Thank you for your comment.

2. Do not allow vehicles in meadows as there is zero need for them to be there.

Commenter 337, 350

Response: Thank you for your comment. The ENF LRMP mandates that roads to and across meadows be closed. In general, the alternatives in the FEIS do not allow public wheeled motor vehicle use through meadows. However, in an effort to balance the need to minimize damage to forest resources and the need to provide a diversity of public wheeled motor vehicle recreation opportunities, a small number or routes that provide a unique recreation opportunity, enhance the recreation experience by connecting routes or areas, provide access to an area of interest, or allow access to dispersed camping are proposed for designation in Alternatives B—D. In Modified B, the preferred alternative, 21 routes with a total of 4.8 miles through meadows are proposed to allow public wheeled motor vehicle use.

3. Damage to existing meadows is evident on the ENF. For example, the damage done to McKinstry Meadow is still apparent.

Commenter 381

Response: Thank you for your comment.

4. Motor vehicle use should not be allowed in any meadow on the Forest. Only properly

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constructed and maintained stream crossings should be available for motor vehicle use. Vehicles found operating in a meadow or streambed outside of a designated and maintained crossing should be confiscated

Commenter 382, 879

Response: Thank you for your comment. Forest Service Best Management Practices provide direction for constructing and maintaining road and trail stream crossings. For example; where practicable, roads and trails will be located at right angles to the Streamside Management Zone. ENF Law Enforcement and Forest Protection Officers can issue citations to people operating vehicles in meadows or streambeds but the Regulations do not allow the confiscation of vehicles.

5. Meadows are precious. 30 route segments in Alt C could damage many meadows.

Commenter 417

**Response:** Alternative C proposes to allow public wheeled motor vehicle use on 24 routes totaling 4.9 miles through meadows. We understand the concern that motorized use through meadows may adversely impact their condition. Therefore, as stated in the Monitoring section of the FEIS, the proper functioning condition of meadows will be regularly monitored.

6. The DEIS discloses habitats for sensitive meadow-riparian species – subalpine fireweed, the moonworts, rare mosses: Bolander's bruchia, Blandow's bog moss; three-ranked hump-moss and broad-nerved hump-moss, and a rare lichen: veined-water lichen – have been impacted by vehicle traffic in meadows.

Commenter 389

**Response:** Thank you for your comment. We agree that public wheeled motor vehicle traffic negatively impacts Forest natural and cultural resources. Therefore, we produced an Environmental Impact Statement in order to inform the Forest Supervisor and the public of the potential impacts of implementing each of the alternatives. Chapter 3 of the FEIS analyzes and discloses those impacts.

7. Do not amend the LRMP to allow motor vehicles to access meadow habitat. Meadows are valuable and rare habitats, comprising less than 3,000 acres on the ENF.

Commenter 47, 246, 340, 367, 873, 892, 894, 895, 896, 897, 898, 900, 1032

Response: Thank you for your comment. The ENF LRMP mandates that roads to and across meadows be closed. In general, the alternatives in the FEIS do not allow public wheeled motor vehicle use through meadows. However, in an effort to balance the need to minimize damage to forest resources and the need to provide a diversity of public wheeled motor vehicle recreation opportunities, a small number or routes that provide a unique recreation opportunity, enhance the recreation experience by connecting routes or areas, provide access to an area of interest, or allow access to dispersed camping are proposed for designation in Alternatives B—D. In Modified B, the preferred alternative, 21 routes with a total of 4.8 miles through meadows are proposed to allow public wheeled motor vehicle use.

# **Minerals**

1. The project proposes to close access intentionally or by misapplication to unpatented mining claims. This project and its associate temporary and permanent forest orders will materially interfere with claimant' and prospectors' existing rights and means to access as provided by 16 USCA 478.

Commenter 1059

**Response:** Thank you for your comment. The Minerals section of Chapter 3 of the FEIS describes that access to unpatented mining claims would be addressed and authorized through a Plan of Operations or other authorization, and so is not directly effected by this project.

# Mountain Biking

1. Mountain biking is one of the most destructive activities allowed in any natural areas, and should not be supported.

Commenter 248

**Response:** Direction pertaining to routes where mountain biking is permitted is outside of the scope of this project.

# **Multiple Use**

1. The trails are used for many other things besides just riding dirt bikes.

Commenter 67

**Response:** The Recreation section in Chapter 3 of the FEIS recognizes that certain routes are used for a variety of recreation activities or provide a variety of recreation opportunities. This section describes the effects of implementing each of the alternatives on the different recreation uses.

## Over the Snow Travel

1. Rules for over-snow travel should be re-written and the reason for the 24" snow depth should be provided. How is a vehicle to get on to a route with 24" of snow if it doesn't first driver over less snow first? It should be recognized that the snow depth varies along roads

Commenter 49, 177, 231, 443, 601, 651, 677, 688, 689, 690, 693, 737, 856

**Response:** Thank you for your comment. Alternative B was modified in response to comments from the public and other information. The wheeled over-the-snow travel direction for Modified B has been rewritten, such that it identifies specific routes where wheeled over-the-snow travel will be prohibited. The California Vehicle Code applies to vehicles operating on NFS lands, and so provides additional direction regarding where non-highway vehicles can travel.

2. Keep ML-3, 4, 5 routes open to avoid increased usage of remaining routes & ML-2 with 12" snow depth and no ground contact

Commenter 64, 854, 862

**Response:** Thank you for your comment. The California Vehicle Code applies to vehicles operating on NFS lands, and so provides restrictions regarding the use of highway and non-highway licensed vehicles. Alternative B was modified in response to comments from the public and other information and identifies specific routes where wheeled over-the-snow travel will be prohibited.

3. Street legal vehicles should not be exempt from the 12" minimum snow depth requirement and WOST should be limited to ML-3, -4, and -5 routes.

Commenter 345, 350

**Response:** The California Vehicle Code applies to vehicles operating on NFS lands, and so provides restrictions regarding the use of highway and non-highway licensed vehicles. Alternative B was modified in response to comments from the public and other information and identifies specific routes where wheeled over-the-snow travel will be prohibited.

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- Modified B does not allow wheeled over the snow travel on native surface roads during the seasonal closure period.
- 4. Winter and wet-season use of wheeled vehicles should be limited to ML-3, -4, and -5 routes. Clearly delineate rules for deciding what is and isn't wet-season. Clear procedures, including use of the internet, should be established for communicating the beginning and end of wet season.

Commenter 382

- **Response:** Thank you for your suggestion. The Implementation Strategy presented in Chapter 2 of the FEIS outlines a process for working with the public to educate and inform visitors about the rules and regulations, including over-the-snow travel.
- 5. Agree with OST requirements of Alt B in addition to prohibiting and adding a gate to 13N22-used for rental hut renters and SMUD's access station by snowcat (does not mix with OHV tracks)

Commenter 361

Response: Thank you for your comment.

6. Keep in mind the Sierra temperatures fluctuate routinely allowing for freeze & thawing to take place, making it impossible to guarantee no vehicle contact. Alternative D's 24" is impractical [for Sierra conditions] and unenforceable.

Commenter 231, 786, 801, 891

- **Response:** Thank you for your comment. The depth of snow differs in Alternative D from the other alternatives because in this alternative wheeled over-the-snow travel would be allowed on specific NFS motorized trails and native surface (ML-2) roads, whereas in the other alternatives, wheeled over-the –snow travel is only allowed on surfaced (ML-3 through 5) roads.
- 7. Where ML-3 through -5 are used for winter purposes other than wheeled motor vehicle use, rules must be established to maintain access to the snow and protect the safety of all users.

Commenter 382

- **Response:** Thank you for your comment. In alternatives B-E, over-the-snow travel would be prohibited on all designated snowmobile routes and cross-country ski trails, even if those routes are located on ML 3-5 roads. Also, over-the-snow travel is prohibited on sections of Mormon Emigrant Trail, sections of Schneider Camp 4WD road, and Robbs Peak road.
- 8. The alternatives are inconsistent in the snow depth inches: Alternatives B, C, &E call for 12" of snow to travel and Alternative D calls for 24", Alternative A has 'no action' for WOST, Alternative E is the most restrictive but calls for 12" instead of 24"; suggest changing Alternative D to 12" minimum to be consistent with B, C, and E.

Commenter 334, 371

- **Response:** Thank you for your comment. The depth of snow differs in Alternative D from the other alternatives because in this alternative wheeled over-the-snow travel would be allowed on specific NFS motorized trails and native surface (ML-2) roads, whereas in the other alternatives, wheeled over-the –snow travel is only allowed on surfaced (ML-3 through 5) roads. Modified B prohibits wheeled over-the-snow travel on specific roads and would not allow wheeled over-the-snow travel on native surface roads during the seasonal closure period.
- 9. Closing routes to over-the-snow travel prevents visitors from seeing the Forest in all four seasons, including the winter.

Commenter 336, 677, 783

Response: Thank you for your comment. The desire for winter access to the Forest was identified during the initial public scoping for this project, and was reiterated during the public comment period on the DEIS. Alternative B was modified in response to this comment and others. Modified B would allow wheeled over-the-snow travel on NFS ML-3 through 5 roads, consistent with California Vehicle Code requirements, would prohibit wheeled over-the-snow travel on specific roads as listed in Chapter 2 of the FEIS, and would not allow wheeled over-the-snow travel on native surface roads during the seasonal closure period.

10. Snowmobile access when snow is at least 4 inches. Surfaced roads open until 8 inches of snow is accumulated.

Commenter 153

**Response:** This Travel Management project does not address snowmobile use or restrictions on snowmobile use.

11. In addition to the prohibitions listed in Alt B-E, wheeled vehicles should not be used on roads critical to non-motorized winter recreation, especially: Loon Lake non-motorized winter recreation area, all roads leading to Van Vleck bunkhouse, all roads leading to Robbs Peak, the road to Echo Lakes, and the road to Woods Lake.

Commenter 159, 160, 172, 345, 347, 368, 409, 411, 417, 643, 644, 647, 1023, 1037, 1045, 1072

**Response:** Thank you for your comment. The routes identified, except for those that the ENF does not have jurisdiction over, are included in the list of routes prohibiting wheeled over-the-snow travel, or are not open to any wheeled motor vehicle use. The FS does not have jurisdiction over the County roads in the vicinity of Loon Lake or Woods Lake. The road leading to Echo Lakes is managed by the Lake Tahoe Basin Management Unit.

12. Adopt the over-the-snow requirements of Alternative C but designate the routes in Alternative E.

Commenter 47, 174, 340, 347, 350, 351, 359, 367, 368, 381, 860, 878, 882, 888, 892, 894, 895, 896, 897, 898, 900, 1024, 1034, 1062

**Response:** Thank you for your comment.

13. Opposed to arbitrary 24 inch snow depth requirement for Alternative D. All other alternatives only require 12 inches. This inconsistency points to the lack of scientific information used to develop the requirements.

Commenter 1028, 1046, 1047, 1103

**Response:** Thank you for your comment. The depth of snow differs in Alternative D from the other alternatives because in this alternative wheeled over-the-snow travel would be allowed on specific NFS motorized trails and native surface (ML-2) roads, whereas in the other alternatives, wheeled over-the –snow travel is only allowed on surfaced (ML-3 through 5) roads.

14. Wheeled vehicles should not be allowed on snow-covered roads, except for paved roads, regardless of snow depth and regardless of whether they are street legal or not. Trashing the snow so that it is unusable by skiers and snowshoes, wheeled vehicles often grind down to the road surface and damage it... accentuating erosion damage.

Commenter 417, 1045

**Response:** Thank you for your comment. This comment and others were considered in modifying Alternative B. Modified B prohibits wheeled over-the-snow travel on specific routes, including cross country ski trails and snowmobile trails, and prohibits wheeled motor

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- vehicles on native surface roads during the seasonal closure period, when routes at higher elevations are commonly covered by snow.
- 15. Alternatives B, C, and E have a 12 inch restriction, while Alternative D has a 24 inch restriction. This seems inconsistent and not rational; please consider making Alternative E have the 24 inch restriction, and Alternative D have the 12 inch restriction.

Commenter 371

**Response:** Thank you for your comment. The depth of snow differs in Alternative D from the other alternatives because in this alternative wheeled over-the-snow travel would be allowed on specific NFS motorized trails and native surface (ML-2) roads, whereas in the other alternatives, wheeled over-the –snow travel is only allowed on surfaced (ML-3 through 5) roads.

16. Request authorization of WOST on all designated routes regardless of snow depth provided no ground contact is made.

Commenter 461, 1103, 1108, 1109

Response: Thank you for your comment. Past experience on this Forest and other Forests in the Sierra Nevada has shown that snow accumulations can vary along a routes length, and that a minimum snow depth has been needed to inform the public of when they are most likely to not make ground contact along a route. The California Vehicle Code restricts non-highway legal vehicles from operating on highways, including Forest ML-3 through 5 roads. Modified B prohibits wheeled over-the-snow travel on specific routes, including cross country ski trails and snowmobile trails, and prohibits wheeled motor vehicles on native surface roads during the seasonal closure period, when routes at higher elevations are commonly covered by snow.

17. Consider increasing snow depth minimum for native surface roads

Commenter 411

**Response:** Thank you for your comment. We consider the proposed depth of 24", along with the requirement of no ground contact, in Alternative D to be adequate.

18. Support 24" snow depth for WOST

Commenter 410

Response: Thank you for your comment.

19. Opposed to 24" snow depth requirement

Commenter 64, 91, 92, 130, 135, 145, 146, 263, 282, 390, 436, 438, 442, 450, 565

Response: Thank you for your comment.

20. Enjoy snow wheeling, reconsideration of the 24"rule. A magic number of 24" for travel is unmanageable, un-enforceable, and a poor idea. Strongly oppose any over snow restrictions of level 2, 3, 4 roads,

Commenter 74, 91, 92, 130, 135, 145, 192, 242, 263, 282, 289, 379, 390, 442, 454, 672, 886, 919

**Response:** Thank you for your comment. The snow depth included in Alternative D was proposed to avoid instances of ground contact which can lead to damage to the road surface and subsequent erosion.

21. In the 24" WOST restriction there is no indication if this minimum depth is to be measured at the beginning of the excursion, at any point during or at the end of the excursion. In areas such as Wrights Lake Recreation Area elevation can change greatly in a short distance, as can snow melting factors such as foliage density and sun exposure. One would have little ability to be certain of snow depth for the entire trip prior to making the trip. Snow depth can also

change dramatically over multi-day trips.

Commenter 642

**Response:** Thank you for your comment. The intent in Alternative D is that wheeled over-the-snow travel will be prohibited unless there is 24 inches of snow and no ground contact. This would apply throughout one's trip, independent of whether they are multi-day, or traversing various elevations.

22. Since Alts B-D prohibit WOST on all designated snowmobile and XC ski trails, I request all documentation pertaining to location of existing or proposed snowmobile routes and XC ski trails

Commenter 461

**Response:** A listing of the marked cross country ski trails and snowmobile trails is included in the project file.

23. All native surface roads should be closed to wheeled over-the-snow travel, regardless of the snow depth. Limit over-the-snow travel to only ML-3, ML-4, and ML-5 roads.

Commenter 159, 160, 361, 362, 382

**Response:** Thank you for your comment. Alternatives B, Modified B, C, and E limit over-the-snow travel to surfaced ML-3 through 5 roads, with prohibitions on certain roads or trails to reduce conflicts between winter recreation uses.

24. I am concerned about year round access to the Rubicon Trail. I use 17N12 and 14N07 and feel these roads should be open year round with no snow limitations.

Commenter 461

Response: Thank you for your comment. The Rubicon Trail, including the portion west of Wentworth Springs, is a county unmaintained road, and this Travel management project does not address use on that road. NFS roads 17N12 and 14N07 (west of the point where it becomes a county road) are surfaced roads, and so would be open to highway legal vehicle use. The California Vehicle Code restricts the use of OHVs on these roads.

25. Support Alt C (over snow rules), with the route designations of Alt D. The proposal for winter use on ML-1 and ML-2 roads under Alt C is better than the winter proposal under Alt D.

Commenter 382

Response: Thank you for your comment.

# **Parking**

1. In all of your alternatives except the No Action, you have limited the parking of a motorized vehicle to one vehicle length from the edge of the route surface. This is unrealistic, not to mention a public safety issue.

Commenter 3, 64, 208, 334, 360, 651, 677, 681, 730, 737, 891

**Response:** Thank you for your comments. Limiting vehicles to one vehicle length from the edge of the route provides a guideline between parking on the route system and driving cross country. The distance proposed in this analysis is the distance currently proposed nationally by the Forest Service. The Forest Service agrees that parking in inappropriate locations or positions can be a safety issue. Following the release of the FEIS and Record of Decision, analysis for designating public motor vehicle use for dispersed recreation will be conducted.

2. How do we include the vast number of dispersed areas on and adjacent to roads where people camp; park for horse, hiking and OHV staging and shooting recreational activities. These

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should be included in the route designation process so we can park and camp, etc. there.

Commenter 44, 58

- Response: Thank you for your comment. The Forest Supervisor at the start of the project decided that wheeled motor vehicle use of dispersed camping sites would be outside the scope of this project, as stated in the NOI published on October 26, 2005. The dispersed areas would also include where people park for horse, hiking, OHV staging and shooting recreational activities. The Implementation Strategy presented in Chapter 2 of the FEIS describes how the ENF intends to work with a collaborative group of public stakeholders to develop a process for designating areas for public motor vehicle use of dispersed camping areas. Parking for above uses would be considered with the dispersed camping areas. This strategy would be completed within one year after the collaborative group is established.
- 3. Won't be able to access certain places to ride or park with horse trailers; important to distinguish between motorized 'travel' and motorized 'use'- as an equestrian I *travel* via truck/horse trailer to access dispersed camping areas, then the vehicle is *used* once parked...;several trailheads will be closed due to parking limit: Caples Creek Trailhead, cut down to one truck and horsetrailer parking, Schneider's Horse Camp, now only roadside parking allowed; group rides will be impossible if horse trailers cannot be reasonably parked at trailheads

Commenter 342, 349

**Response:** Thank you for your comment. The Implementation Strategy presented in Chapter 2 of the FEIS describes how the ENF intends to work with a collaborative group of public stakeholders to develop a process for designating areas for public motor vehicle use of dispersed camping areas. Parking for horse trailers would be considered with the dispersed camping areas. This strategy would be completed within one year after the collaborative group is established.

4. Provide and allow parking at attraction sites such as Spider Lake and Buck Island Commenter 204, 677, 785

**Response:** The Implementation Strategy presented in Chapter 2 of the FEIS describes how the ENF intends to develop a strategy for designating areas for public motor vehicle use of dispersed camping areas after the completion of the Record of Decision. Parking for dispersed recreation would be included along with the dispersed camping.

5. Vehicles can access and be parked in many existing dispersed sites without causing damage to the forest

Commenter 659, 677

**Response:** Thank you for your comment.

6. One vehicle length destroys safe, relatively dust free, high quality dispersed vehicle camping in public lands

Commenter 349, 383, 1103

**Response:** The Implementation Strategy presented in Chapter 2 of the FEIS describes how the ENF intends to develop a strategy for designating areas for public motor vehicle use of dispersed camping areas after the completion of the Record of Decision. Designation of areas for dispersed camping by wheeled motor vehicles will take place as a separate analysis.

7. Parking vehicles not more than one car length off the main road leaves us open to vandalism and theft plus does not support a peaceful atmosphere for relaxation.

Commenter 728

**Response:** Thank you for your comment. Limiting vehicles to one vehicle length from the edge of the route provides a guideline for differentiating between parking on the system and driving cross-country and is the currently proposed FS national policy. Based on public input on the DEIS, Alternative B was modified and a number of roads are included which provide access to dispersed recreation, such as hunting and fishing.

8. The distance vehicles are allowed off designated routes (for parking, turning around, etc) should be specified and enforced. We support limiting parking to one vehicle length and believe it is a critical issue for rulemaking and enforcement.

Commenter 382

**Response:** Thank you for your comment. Limiting vehicles to one vehicle length from the edge of the route provides a guideline between parking on the route system and driving cross country. The distance proposed in this analysis is the distance currently proposed nationally by the Forest Service.

9. Parking has created a camping restriction; this topic has not been addressed and clearly presented to the public

Commenter 349, 375

**Response:** In Chapter 1 of the FEIS, the Forest Service acknowledges under Significant Issue Statement 1: A reduction in motorized routes, changes in class of vehicles allowed, prohibition of cross country travel, and seasonal closure during wet weather periods, will adversely affect forest visitors and adjacent landowners and will:

10. Adversely affect visitors with disabilities by limiting easy access to general areas and dispersed camping sites ....

Limit camping opportunities....

Limit parking for parking for recreational purposes

The effects analysis does use percent of inventoried dispersed sites within 300 feet of public wheeled motor vehicle access as and indicator measure in Chapter 3 of the FEIS in the Recreation section.

Change to 100' from the edge of the route; one vehicle length may work for a scenic or lunch stop, but not for camping- include appropriate pull-out or spur route to access traditional dispersed camping sites

Commenter 349, 371

**Response:** The Implementation Strategy presented in

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in the designation the limited use of motor vehicles within a specified distance of certain designated routes, and if appropriate within specified time periods, solely for the purposes of dispersed camping..."

- Because of the need to comply with the U.S. District Court Order, the Forest Supervisor decided to limit the scope of this project to not include dispersed camping. However, the Implementation Strategy presented in Chapter 2 of the FEIS describes how the ENF intends to develop a strategy for designating areas for public motor vehicle use of dispersed camping areas after the completion of the Record of Decision.
- 13. Designate the appropriate "wide out" or spur for traditional dispersed camping sites as Kathy Mick explained in the NOHVCC workshop.

### Commenter 371

- **Response:** The Implementation Strategy presented in Chapter 2 of the FEIS describes how the ENF intends to develop a strategy for designating areas for public motor vehicle use of dispersed camping areas after the completion of the Record of Decision.
- 14. The restriction for parking for non-campers alongside roads unfairly limits non-motorized recreation.

### Commenter 1039

- Response: Thank you for your comment. The Recreation section of Chapter 3 of the FEIS does recognize there are effects to non-motorized recreation from the alternatives. Indicator Measure 3 examines the types of use changes affecting current existing NFS motorized and non-motorized trail mileage. Indicator Measure 4 of the proposed seasonal closure relate both the months that motorized recreation will not be allowed to use native surface roads and trails, and conversely, the time of year that conflicts between motorized and non-motorized uses will be minimized. The effect on non-motorized recreation activities that are accessed by native surface roads is considered. Indicator Measure 5 analyzes the mileage available for over the snow travel can indicate the opportunity for engaging in this activity as well as the opportunity for non-motorized winter recreation. Indicator Measure 6 examines the percent of inventoried dispersed sites within 300 feet of roads and trails is useful for indicating the ease of access for both motorized and non-motorized dispersed recreation. Indicator Measure 7 analyzes the number of acres located away from roads and trails for the opportunity of quiet recreation on the Forest. The Implementation Strategy presented in Chapter 2 of the FEIS describes how the ENF intends to develop a strategy for designating areas for public motor vehicle use of dispersed camping areas after the completion of the Record of Decision.
- 15. DEIS is unclear how parking will affect parking along natural surface routes. The definition of parking 'one vehicle length off route surface' is too vague to be applied uniformly across the forest. Request the Forest Service alter the policy for naturally surfaced routes to allow for parking within a reasonable distance from the center of the route in order that it may be uniformly enforced throughout the forest. I recommend altering this to specify a distance of 100 feet from the center of the trail provided that it could be done safely and without resource damage. I further recommend that you leave all spur routes in to allow parking off of the road and to access camping areas.

## Commenter 379

**Response:** Thank you for your comment. Because of the need to comply with the U.S. District Court Order, the Forest Supervisor decided to limit the scope of this project to not include the use of wheeled motor vehicles to access areas for dispersed camping. The Implementation Strategy presented in Chapter 2 of the FEIS describes how the ENF intends to develop a

strategy for designating areas for public motor vehicle use of dispersed camping areas after the completion of the Record of Decision. Parking for dispersed recreation would be included along with the dispersed camping.

16. Alts B through E would create an impossible parking situation for equestrians to use the many trails designated multiuse. In essence they create a de facto situation to severely limit equestrian use of ENF; they make group rides impossible.

Commenter 974

- Response: Thank you for your comment. This project is to establish the "backbone" of a travel management system, consistent with the national Travel Management regulations and the requirements of a recent Federal Court order. In an effort to keep the scope of the project manageable and to be able to comply with the Court mandated timeline, the Forest Supervisor at the start of the project, decided that access to all dispersed sites would be outside the scope of this project. An Implementation Strategy is presented in Chapter 2 of the FEIS. One element in the Implementation Strategy is to work with a collaborative group of public stakeholders to develop a process for designating areas for public motor vehicle use of dispersed camping areas. Parking for equestrians would be considered with the dispersed camping areas. This strategy would be completed within one year after the collaborative group is established.
- 17. One-vehicle length restriction will result in encroachment of parked vehicles on routes and pose a safety hazard. Groups of vehicles are often more safely parked on dead-end spurs than strung out along the roadside. RVs parked close to the road present added hazards such as darting children entering traffic. Rethink this.

Commenter 339

Response: Thank you for your comment.

18. Unless the no action alt is selected, there will most likely be more money wasted in lawsuits from the OHV, hunting, mining, fishing, and other public land rights groups. The movement against this project is just beginning to gain momentum; perfect time for ENF to find a way to manage the Forest and show others ENF does not have to close trails in order to satisfy others; closing spurs and dispersed camping will also severely reduce the experience of OHV users and lead to inevitable and previously avoidable conflicts

Commenter 301, 358, 787

**Response:** Thank you for your comment.

19. Parking areas, etc. need to be clearly marked

Commenter 142, 331

- **Response:** Developed recreation areas such as boat ramps may have clearly marked parking areas, but some developed areas may not have clearly marked parking areas. Most dispersed recreation areas do not have clearly marked parking areas. The motor vehicle use map, local travel map and forest brochure would provide information on where parking is allowed.
- 20. The ENF has always been obligated to protect resources. Since dispersed camp sites have never been closed, one can assume that vehicles can access and be parked in many existing dispersed sites without causing damage to the forest

Commenter 383

Response: Thank you for your comment. While it is true that many dispersed sites do not adversely impact Forest resources, dispersed sites related to resource damage can be, and have been, closed to public use. The Forest Supervisor at the start of the project decided that access to all dispersed sites would be outside the scope of this project. One element in the

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Implementation Strategy in Chapter 2 of the FEIS is to work with a collaborative group of public stakeholders to develop a process for designating areas for public motor vehicle use of dispersed camping areas that are not impacting Forest resources.

# Permit System/ Use Fees

1. Rather than close down or limit the public access, why not have OHV permits? The permits could be modeled after such things as hunter safety cards, with a 4-8hr "safety and education course" being required, in which the Forest Service would have the opportunity to educate and instruct people in the proper use of OHV lands. The money raised from such permits and safety courses could then be re-invested into trail and land maintenance along with other education and safety training courses.

Commenter 29, 40

Response: Thank you for your suggestion. The Forest Supervisor has decided that implementing a quota or permit system to regulate public wheeled motor vehicle use on the Forest is outside the scope of this analysis. The implementation strategy in Chapter 2 of the FEIS outlines the plan for a volunteer strategy to be developed within six months of the release of the Forest Supervisor's decision. A main part of that strategy is to determine how the public can help educate other Forest users about the designated system and riding safely.

2. Create an off-road licensing program for those who drive on an unmaintained road.

Commenter 1014

**Response:** Thank you for your suggestion.

3. Charge entry fees for motorized vehicle use on trails.

Commenter 468, 537, 700, 722, 830, 1014

**Response:** Thank you for your suggestion. The purpose of this project is to prohibit cross-country travel and designate roads and trails for public wheeled motor vehicle use. Charging entry fees to use motorized vehicles on trails is outside the scope of this project. In addition, the Forest Supervisor has determined that he does not want to charge entry fees for public wheeled motor vehicle use on the Forest.

4. A permit system should be used to limit the number of OHVs on any high density use route or area, just like they do for hiking trails in popular public areas.

Commenter 1012, 1062

**Response:** Thank you for your suggestion. The Forest Supervisor has decided that implementing a quota or permit system to regulate public wheeled motor vehicle use on the Forest is outside the scope of this analysis.

5. FS should incorporate an event-only permit system which will allow organizations to use specific routes which may not be ideal for the general public- these routes offer unique recreational and management challenges that can be amply and actively managed through the special use permitting process.

Commenter 386

**Response:** This travel management project addresses public wheeled motor vehicle use and does not address uses or activities authorized under a separate special use permit or other authorization. Event only trails are specific routes that are authorized for a specific use under a separate special use authorization, and are not open for public motor vehicle use, except during the event and for specific activities authorized as a part of the event. Current regulations allow for use of routes when authorized under a separate special use permit. As

#### Commenter 633

- **Response:** OHV, or greensticker, fees are collected by the State of California OHV Division. A portion of the money collected is distributed to Federal and State agencies through the OHV trust fund grant program that is administered by the State of California OHV Division. The grant funds are available for various purposes, such as trail maintenance, law enforcement, restoration, etc. Funding for trail maintenance, facility maintenance and new construction has been limited in the recent past. The Eldorado National Forest applies yearly for grant funding from the State. Our success in receiving those grants determines the level of OHV funds available to the Eldorado National Forest.
- 12. CA has some of the highest gas taxes in the nation. If used wisely, these taxes should be more than enough to cover the costs of what little trail maintenance is required. Keep the dozers off the trails and you save money. Only use them to keep the fire roads open.

### Commenter 24

- Response: The ENF does not directly receive revenue from California gas taxes. The Eldorado Forest's budget is based on a number of factors. Federal funding for the management of the Forest is based on funding approved by Congress for a variety of activities, such as fire hazard reduction, wildlife management, vegetation and soil management, as well as recreation management. Funds appropriated by congress can generally only be used for the purposes set by congress, such that funding for wildlife management cannot be used for maintaining recreation trails. Funding to the Forest Service is distributed by various formulas from the national level and regional level. The Forest also utilizes other funding sources, such as collection agreements, grants, and certain recreation fees collected.
- 13. Suggest that FS submit significant restoration grant request to Cal Off-Highway Motor Vehicle Recreation Division to restore unauthorized OHV routes in wilderness, wild & scenic river corridors and primitive/semi primitive non-motorized areas.

### Commenter 389

- **Response:** Thank you for your comment. Although the ENF does regularly apply for grants from the State of California OHV Trust Fund, the purpose of this project is to ban cross-country travel and designate roads and trails for wheeled motor vehicle travel. Applying for a restoration grant is outside the scope of this project.
- 14. Closing OHMVR funded trails to motorized use are not closed to non-motorized use. The only people who can't use them are the ones who funded them.

## Commenter 893

- Response: Thank you for your comment. The Travel Management Rule requires the ENF to ban cross-country travel and limit public wheeled motor vehicle travel to designated roads and trails. The Forest Supervisor is required to consider the effects of allowing public wheeled motor vehicle use on National Forest System natural and cultural resources, public safety, provision of recreational opportunities, access needs, conflicts among uses of National Forest System lands, the need for maintenance and administration of roads, trails, and areas that would arise if the routes are designated; and the availability of resources for that maintenance and administration. Prohibiting cross-country travel is part of the purpose and need of this project and are outside the scope of this analysis.
- 15. ENF should more aggressively pursue alternate funding sources, such as state grants and RTP grants, to manage and sustain OHV opportunities.

## Commenter 383

**Response:** Thank you for your comment. The ENF applies yearly for OHV Trust Fund grants from the State. We routinely apply for trail maintenance and facility maintenance grants, as

well as Law Enforcement and Restoration grants. Our success in receiving those grants determines the level of OHV funds available to the Eldorado National Forest.

16. The ENF should not permanently close routes that were maintained in good faith by user groups and funded in some cases by CA OHMV Recreation dollars without listing the threats and offering the user groups the opportunity to mitigate any threats.

Commenter 378

**Response:** Thank you for your comment. In order to keep the scope of the travel management project manageable and to be able to comply with the court mandated timeline, the Forest Supervisor at the start of the project, John Berry, decided that any route reconstruction would be outside the scope of this project. In the implementation strategy in Chapter 2 of the FEIS, we highlight the development of a public volunteer strategy to identify opportunities for volunteers to help implant, maintain, enforce, and educate other Forest users about the designated route system.

17. If closing trails that have had OHMVR dollars spent on them, ENF needs to offer a clear plan as to how the Forest will repay the lost value from the system

Commenter 61, 378

**Response:** Thank you for your comment. We feel that we met our commitment to the State by using the grant money in the manner specified in the application. The cooperative agreements entered into between the State of California OHV Division and the ENF do not require that trails in which Trust Fund money is spent be operated in perpetuity.

18. I want my green sticker money and support keeping trails open, not closing them.

Commenter 329

**Response:** Thank you for your comment.

19. Consider a maximum amount of vehicles allowed at any given time, such as a permit system. Commenter 1012

**Response:** Thank you for your comment. The Forest Supervisor has decided that implementing a quota or permit system to regulate public wheeled motor vehicle use on the Forest is outside the scope of this analysis.

## **Private Land Concerns**

1. Some of the 1200 miles of lost routes includes those to private party adjacent to the Forest, including routes 08N61, 08N61A, 08N61B, 08N61D, 08N62, 08N62A, 08N69A, 08N73, 08N73A, 08N73C, 08N85, 08N86.

Commenter 1001

**Response:** Federal regulations recognize that owners of private land within or adjacent to NFS lands shall be permitted ingress and egress over those NFS lands and use of existing NFS roads and trails to reach their homes and to utilize their property. However, that use shall conform to rule and regulations governing the protection and administration of the lands and the roads or trails to be used (36 CFR 212.6(b). In some instances, where private land owners wish to use roads that are not open to the general public, a separate authorization may be issued.

2. Private property rights should be respected

Commenter 350

**Response:** One of the ENF's standards and guidelines for Management Practice 27 states that roads and trails for which required rights of way do not exist and those located

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predominantly on private land will not be designated for OHV use and that a list will be developed of priority right-of-way needs to complete the desired road and trial system (ENF LRMP Page 4-84). As a part of the initial data collection for the development of the alternatives, a list was developed of those routes lacking a public right-of-way. The portions of those routes lacking a right-of-way were excluded from the action alternatives up to a logical stopping point, such as a turn-around point, intersection, etc.

3. There has been a trail across that property near Highway 88 for over 150 years. We as a motorized public have prescriptive rights across that property.

#### Commenter 1

- Response: Prescriptive access rights are public rights that may be exercised and asserted by any member of public, or entity acting on the public's behalf. Prescriptive rights must be affirmed by court decision. In the absence of a court decision, prescriptive rights are only alleged and may or may not be capable of perfection. In asserting access rights on behalf of the public at large, a showing must be made that there is authority to act in that representative capacity. Under state law, it is clear that counties are designated representatives of the public on access issues. Generally federal agencies, including the FS, do not pursue prescriptive rights but rather work with private landowners to obtain a right-of-way or, in unique circumstances, exercise eminent domain. The Forest has worked with private landowners in the past to address specific situations and will continue to acquire rights-of-ways in the future as resources are available and as opportunities arise. The Implementation Strategy provides direction to work with the public to develop a process for considering the addition of routes or changes in management of the designated system. This process will help to guide prioritization of acquiring future rights-of-way where needed.
- 4. Arbitrarily rejected a large number of popular historic OHV routes simply because segments of it end or transect private property. To do so is denying the public explicit or implicit access rights conferred by state legislature to allow public use of such land for recreational purposes.

## Commenter 385, 386

- Response: The Forest did not arbitrarily reject routes, but rather was complying with Forest standards and guidelines in those instances where routes cross private land for which no public right-of-way exists (ENF LRMP Page 4-84). As a part of the initial data collection for the development of the alternatives, a list was developed of those routes lacking a public right-of-way. The portions of those routes lacking a right-of-way were excluded from the action alternatives up to a logical stopping point, such as a turn-around point, intersection, etc.
- 5. Element 2.4: *Impacts on private property* is measured by: 1. "Miles of road and trail allowing for public motor vehicle use across private property." Private property is also impacted by motor vehicle use on routes from which noise generated can be heard on the private property. This includes vehicle use, as well as noise from guns fired by forest visitors, who are either "plinking" or hunting.

## Commenter 389

**Response:** The element identified is used to display the differences between alternatives in regards to the significant issues raised by the public during the initial scoping. The concern about noise impacts to private property from wheeled motor vehicle use is addressed in the effects analysis in the Adjacent Land Ownership section of Chapter 3 of the FEIS. In this section, there is a discussion under Indicator Measure 2 for each alternative relating to the impacts from public wheeled motor vehicle use on routes within ½ mile of existing private residences. This indicator measure is based on the Forest standard and guideline which states that OHV use will generally be excluded within ½ mile of privately owned property

with existing residences. This standard and guideline was developed to address concerns about impacts to private residences, including from vehicle noise.

6. Obtain easement for small parcel near Ellis Creek

#### Commenter 405

- Response: Thank you for your suggestion. The Forest will work with private landowners to acquire rights-of-way across private lands as opportunities and resources allow. The Implementation Strategy provides direction to work with the public to develop a process for considering the addition of routes or changes in management of the designated system. This process will help to guide prioritization of acquiring rights-of-way where needed.
- 7. Adjacent Land Ownership, Environmental consequence, Alt. "B", indicator measures 1, on page 255, 256 and 257. "Vandalism and theft from public wheeled motor vehicle use." Could it have been "licensed vehicle users" from Hwy 88? If the FS cannot verify this comment, I request that it be removed and the impact it creates to ATV users from Plasse's resort. The "licensed vehicle" right-of-way recently created by the FS may actually increase the potential for vandalism at the cabins.

Commenter 1, 154, 334, 1083, 1113

- **Response:** The discussion under Indicator Measure 1 does not differentiate between the class of vehicle or how the vehicle accessed the route. As called for in the MOU with the private landowners along NFS road 9N05, barriers will be installed Spring 2008 on this road in that segment across private property to restrict all wheeled motor vehicles from traveling across the private property, independent of the class of vehicle.
  - 8. Closing trails that lead to private property because you're concerned about trespass isn't your concern. What if someone has permission to pass?

# Commenter 193

- **Response:** The ENF Standard and Guideline states that roads and trails for which a right-of-way does not exist will not be designated for public wheeled motor vehicle use. However, we do allow use on portions of some routes that end at a reasonable stopping place before reaching the private property.
  - If the property owner is not willing to grant the FS a public right-of-way, then we cannot allow public use on the land that leads to that private property. Conversely, the private property owner does not have the authority to allow public wheeled motor vehicle use on NFS land.
- 9. Was mitigation of route problems such as obtaining 'prescriptive easements' for routes that cross private property, rerouting routes that have erosion, drainage or other problems considered before adding the routes to the closed list?

### Commenter 334, 637

Response: The Forest Supervisor, at the start of the project, determined that construction of new routes, reconstruction of routes and relocation of roads or trails would be outside the scope of this project in order to comply with the Federal Court ordered time frame. The Forest did pursue obtaining a right of way to provide access to the Mud Lake Road (NFS road 9N05), which allows public access to a number of popular driving and riding routes, such as Squaw Ridge Road (NFS road 9N82) and Emigrant Trail (NFS trail 17E28). This is described in the Adjacent Land Ownership section in Chapter 3 of the FEIS. The Implementation Strategy provides direction to work with the public to develop a process for considering the addition of routes or changes in management of the designated system. This process will help to guide

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- prioritization of acquiring future rights-of-way where needed, as opportunities and resources are available.
- 10. The DEIS makes no attempt to identify ways that existing route problems could be mitigated by public or private action. Instead it attempts to close any route that has a problem for any reason. I want to know what the specific issues are on (many) routes or areas and what needs to be done to mitigate those issues short of closing the routes.

Commenter 199

- Response: The Forest Supervisor, at the start of this Travel Management project, determined that construction of new routes, reconstruction of routes and relocation of roads or trails would be outside the scope of this project in order to comply with the Federal Court ordered time frame. This project is to establish the "backbone" of a travel management system and recognizes that routes may be added in the future. The Implementation Strategy provides direction to work with the public to develop a process for considering the addition of routes or changes in management of the designated system.
- 11. Act of Congress RS 2477 right of way is limited by the established and historical usage of the route and of the date of repeal of the statute. No formal action of the FS is required nor any informal action required to be recorded to have the right of way. The FS may not use its authority to infer, obstruct, or otherwise materially interfere with the routine maintenance of these roads and trails performed by the public who are the vested property holders of the RS2477 right of way.

Commenter 204, 443, 774, 787, 825, 1059

- **Response:** This Travel Management project will have no effect on RS2477 rights and has not proposed to provide direction on roads or trails that are under the jurisdiction of the State or County. Under RS 2477, only Counties or other public agencies can hold the right of way, and not individual members of the public.
- 12. Many routes listed for closure in DEIS are protected by FLPMA. FS does not have legal right to close.

Commenter 142, 620

**Response:** The Federal Land Policy and Management Act (FLPMA) does not relate to access to private land. FLPMA does authorize the Secretary of Agriculture to issue easements across public lands (including certain NFS lands) for various purposes. This project addresses general public wheeled motor vehicle access to roads and trails and does not effect holders of easements issued under the authority of FLPMA.

# **Public Notification/Involvement**

1. We found the public meetings to be intimidating and dominated by the off-roaders. Their coarse, rude behavior had a chilling effect on the rest of the public who either stayed away from the meetings, or declined to comment publicly; we hope the Forest Service will not interpret the silence of the majority in these public venues acceptance of allowing OHVs to dominate our public lands. We also trust the Forest Service will explain this constraint on public comment to any public officials that may interpret it as a lack of interest.

Commenter 389

**Response:** Thank you for your comment. We understand that some people felt intimidated at the meetings for the DEIS and we are working to ensure that everyone feels safe and welcome at all future meetings. The Forest Supervisor is very aware that this project affects many types of recreation, including motorized and non-motorized, and will consider those effects when making his decision.

2. BCHC would like to note our concern that the FS's public notice of the Route Designation Project as reported in the local press was directed toward OHV users. There was insufficient notice given to equestrians informing them of their historic right to use t

Commenter 974

**Response:** Thank you for your comment. As noted in the public involvement appendix of the FEIS, our public involvement strategy included, but was not limited to, public meetings, conference calls, field trips, and open houses in order to notify as many interested people as possible (40 CFR 1506.6). We also put notices in the newspaper, on our website, and sent notices out to our 600 person email list.

3. Public comments should not be limited.

Commenter 153

**Response:** We agree that public comments should not be limited. We extended the comment period on the DEIS to ninety days so that people would have plenty of time to submit comments.

4. Stop all NF DEIS activity until ALL of the public can be notified of the illegal road closures. Commenter 204

**Response:** The public involvement appendix in the FEIS outlines the public involvement schedule and process used to involve as many interested people in the Travel Management process as possible (40 CFR 1506.6). We put notices in the newspaper, on our website, and sent notices out to our 600 person email list. To that end, we had over 1200 attendees at our DEIS public meetings and more than 6000 people provided comments.

5. Why is such a massive decision being made with only the input from one small group? Commenter 769

Response: The public involvement appendix in the FEIS outlines the public involvement schedule and process used to involve as many interested people in the Travel Management process as possible (40 CFR 1506.6). We put notices in the newspaper, on our website, and sent notices out to our 600 person email list. To that end, we had over 1200 attendees at our DEIS public meetings and more than 6000 people provided comments.

6. As a property owner within the forest, we were given no notification of the route designation process. The general public was not properly notified of the project and is still not adequately informed.

Commenter 193

Response: The public involvement appendix in the FEIS outlines the public involvement schedule and process used to involve as many interested people in the Travel Management process as possible (40 CFR 1506.6). We put notices in the newspaper, on our website, and sent notices out to our 600 person email list. To that end, we had over 1200 attendees at our DEIS public meetings and more than 6000 people provided comments. We do understand that not everyone has been informed so we are always working on ways to improve our public involvement strategy.

7. Use DMV addresses from greensticker registration to keep appropriate interested parties informed and updated.

Commenter 633

Response: Thank you for your suggestion.

8. Inadequate time to comment on 600-page DEIS, even with 45-day extension Commenter 8, 531, 633, 439, 754, 762, 766, 783, 784, 808, 856

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Response: Thank you for your comment.

9. Add time and steps to help users understand and comment on every aspect of the project. Commenter 783

**Response:** Thank you for your suggestion. The Forest Supervisor did extend the comment period an additional 45 days in order to allow the public ample time to review the DEIS.

10. Request that you approve a 60 day extension to the comment period for the DEIS. This document has taken over 2 years to put together and over 1,600 pages to review along with several proposed maps. Forty-five days is not enough time for the public to respond with quality comments on this important document.

Commenter 64, 154, 681, 669, 737, 1010, 1108, 1109

**Response:** Thank you for your suggestion. The Forest Supervisor did extend the comment period an additional 45 days in order to allow the public ample time to review the DEIS.

11. Timeframe too short for FS to field check public feedback on specific trails.

Commenter 565

**Response:** Thank you for your comment. We are working under a court mandated timeline to complete the project by April 2, 2008. We are confident that this allows enough time for the Travel Management team to review all comments received from the public.

12. Request that FS allow period of time after publication for public comment.

Commenter 461

**Response:** Thank you for your comment. The public was allowed 90 days to provide comments on the DEIS. The FEIS and Record of Decision will have a 45 day appeal period that will begin when the announcement that the Record of Decision is released in the newspaper of record. For the ENF, that is the Mountain Democrat.

13. The time frame provided for comment was inadequate because of late mailing (Sept. 29) and the mailing did not include paper copy of the maps as requested.

Commenter 385

**Response:** Thank you for your comment. We worked hard to mail out CDs of the DEIS as soon as we received requests. Due to the high cost of producing paper maps, they were included on the CD of the DEIS. Also, paper copies of the Alternative maps were available for viewing at the ENF Supervisor's office and the four District offices.

14. DEIS fails to include information and public disclosure concerning the formulation of alternatives to meet the planning objectives, alternative evaluation, analysis, and comparison of alternatives.

Commenter 385

**Response:** Thank you for your comment. Chapter 2 of the FEIS explains how the alternatives were developed, describes each alternative in detail, and provides a comparison of the alternatives. Chapter 3 of the FEIS provides the analysis of the possible adverse effects of implementing each alternative.

15. The Forest Service has not provided the public with the rational that will drive this decision. Commenter 5

**Response:** Chapter 1 of the FEIS provides background information on the previous efforts at Travel Management on the ENF, a summary of the U.S. District Court Order concerning our 1990 OHV Plan, and a summary of the USFS National Travel Management Regulations.

Also, the purpose and need for action, the applicable ENF LRMP Standards and Guidelines, and the significant issues are explained in Chapter 1 of the FEIS.

16. Want to know the specific issues for closing routes or areas.

Commenter 64, 208, 631, 651, 681, 737, 768, 1001, 1108, 1109

**Response:** Thank you for your comment. Chapter 1 of the FEIS lists the applicable ENF LRMP standards and guidelines that we used to guide our decision making for allowing public wheeled motor vehicle use. For Modified B in the FEIS, Appendix F lists the rationale for not allowing public motor vehicle use on all ML-2 roads. Also, Appendix G provides a rating of the recreation opportunity and resource concerns for every ML-1 route, as well as the proposed uses under each alternative.

17. I would appreciate a copy of the proposed closure plans so that it can be shared with Senators and Congressional Representatives

Commenter 774

- **Response:** Thank you for your comment. You are more than welcome to share all Travel Management documents with your elected officials. The FS has continually updated elected officials throughout the Travel Management process.
- 18. Expand the range of Alternatives and receive additional public comment in order to provide a range of motorized route options that better encompasses the route network historically mapped, maintained and traveled on the Eldorado.

Commenter 360

- **Response:** Thank you for your comment. Alternative A, the no action alternative, allows public wheeled motor vehicle use on all routes where that use is now occurring, as well as 526 miles of unauthorized routes. Alternative A does not prohibit cross-country travel but the effects analysis in Chapter 3 clearly describes the effects of this activity in the description of effects for Alternative A, so that those impacts can be considered separately by the deciding officer.
- 19. Back off current timeline and postpone selecting an alternative. Timeframe is too short for FS to follow up in the field.

Commenter 651, 677, 754, 762, 783, 784, 808, 856

- Response: Thank you for your comment. The Forest Supervisor has decided that meeting the court mandated deadline of April 2, 2008 is a priority and he is not interested in requesting more time from the Court. We are confident that the current timeline allows enough time for the Travel Management team to review all comments received from the public.
- 20. Barring development of SEIS, ENF could create one or more alternatives, receive public comment and still release final decision within current timetable.

Commenter 360

**Response:** Thank you for your comment.

21. Closing trails because they did not meet the ENF trail guidelines is arbitrary and flawed because these guidelines were not developed per NEPA and were not subjected to public review and comment. Consider a project to correctly review your trail guidelines and subject the document to public review and comment.

Commenter 637

**Response:** Thank you for your comment. The standards and guidelines related to trail management are taken from the ENF Land and Resource Management Plan released in 1989. The LRMP was analyzed according to NEPA guidelines. As outlined in 40 CFR 1506.6, the public was involved in the development of the LRMP.

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22. FS should engage pro-access groups to develop plan

## Commenter 458

- Response: As outlined in the Public Involvement appendix of the FEIS, the ENF held public meetings, open houses, field trips, and conference calls in order to solicit input on the Travel Management project from interested groups and individuals We also put notices in the newspaper, on our website, and sent notices out to our 600 person email list to solicit input on the project.
- 23. The power to close or limit such trail use needs to be brought to the attention of these "STAKEHOLDERS" in a better fashion. Going behind the backs of the general public and holding a "town meeting" does not constitute what the general population feels is appropriate. And there must be a better forum for these types of debates. I found almost no type of information regarding these measures, and suppose that they aren't to be easily found.

#### Commenter 67

- **Response:** Thank you for your comment. As outlined in the Public Involvement appendix of the FEIS, the ENF held public meetings, open houses, field trips, and conference calls in order to solicit input on the Travel Management project from interested groups and individuals. We also put notices in the newspaper, on our website, and sent notices out to our 600 person email list concerning all phases of Travel Management.
- 24. I am writing to express my opposition to the proposed trail close. It seems clear that not all the stake holders were included in the selection of alternatives. I was not aware of the process until tonight. I believe the planning process needs to be reopened with a more inclusive approach taken to create consensus on this plan.

#### Commenter 33

- **Response:** The public involvement appendix in the FEIS outlines the public involvement schedule and process used to involve as many interested people in the Travel Management process as possible (40 CFR 1506.6). We put notices in the newspaper, on our website, and sent notices out to our 600 person email list. To that end, we had over 1200 attendees at our DEIS public meetings and more than 6000 people provided comments.
- 25. The Folsom meeting date, time, and address on your website was wrong. How much public awareness was there for the second meeting in Jackson?

## Commenter 766

- **Response:** Thank you for your comment. The second meeting in Jackson was not planned by the USFS. We were invited by Amador County Supervisor Ted Novelli to present the DEIS to his constituents. The meeting was advertised in the local paper, on the local community TV channel, and local radio stations.
- 26. Thank you for reaching out to people who live further away. Your effort is appreciated Commenter 1011

Response: You are welcome.

27. The MOI with California State Parks is rushing the route designation process compared with the rest of the country.

#### Commenter 61

Response: The Memorandum of Intent regarding the completion of Travel Management was signed between the U.S. Forest Service and the Division of Off-Highway Motor Vehicle Recreation of the Department of Parks and Recreation of the State of California, as described in Chapter 1 of the FEIS. The MOI governs all 18 National Forests in California and states that Travel Management will be complete on those National Forests by September, 2008. The

ENF is under a U.S. District Court Order to complete the Travel Management project and release a decision by April 2, 2008.

# **Public Suggestion**

1. Routes should remain open if it is 1. Identified on official FS maps 2. Is currently marked with official FS signage 3. Has been maintained by the FS for public access 4. has a FS route identification

Commenter 379

**Response:** Designating all routes that meet the four criteria mentioned above would not comply with the criteria for designating National Forest System Routes outlined in the Travel Management Rule (36 CFR 212.55). The Rule requires the Forest Supervisor to consider the effect of designated routes on natural and cultural resources, public safety, provision of recreational opportunities, access needs, conflicts among uses of NFS lands, the need for maintenance and administration; and the availability of resources for that maintenance and administration.

2. Set a 35 mph Speed limit on unsurfaced roads and a 10 mph speed limit within 100 ft of residences, campsite, person, livestock, or animal.

#### Commenter 153

**Response:** Thank you for your comment. The purpose of this project is to regulate unmanaged public wheeled motor vehicle travel, comply with U.S. District Court order, make limited changes to the ENF NFS roads and trails, and to comply with the ENF LRMP. Designating speed limits on NFS roads is outside the scope of this project.

3. There needs to be a trail system rating and signage that discourages lesser skilled riders and inappropriate users for particular trails.

#### Commenter 61

Response: Thank you for your comment. The ENF divides trails into three levels of difficulty: easiest, more difficult, and most difficult. In general, trail ratings are posted on trail signs. In the Implementation Strategy in Chapter 2 of the FEIS, we highlight the need to provide a Forest brochure with examples of signs on the ground and clear, consistent, adequate signage.

4. Alt B sentence should be in final: "A designation for a road or trail includes all terminal facilities, trailheads, parking lots, and turnouts associated with the designated road or trail."

## Commenter 461

**Response:** Thank you for your comment. The above sentence is in the Alternative B description in the FEIS.

5. Amend the preferred alternative to include the limited use of motor vehicles within a specified distance of certain designated routes where dispersed camping has historically been allowed in order that persons with disabilities may continue to enjoy these recreation

## Commenter 379

Response: Thank you for your comment. Limiting vehicles to one vehicle length from the edge of the route provides a guideline for differentiating between parking on the system and driving cross-country and is the currently proposed FS national policy. Based on public input on the DEIS, Alternative B was modified and a number of roads are included in which provide access to dispersed camping areas. Regional guidance regarding cross country travel for dispersed camping has been developed, and following the release of the Final EIS and

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Record of Decision, additional analysis for designating public motor vehicle use of dispersed camping areas will be conducted.

# **Purpose and Need**

1. Prohibiting OHV use on the forest fails to meet the purpose and need for this project and it therefore eliminated from detailed study. Let's try and keep this statement in mind when the Final EIS comes out.

### Commenter 1

- **Response:** Thank you for your comment. We agree that not allowing OHV use on the ENF does not meet the pupose and need of this project. Therefore, that is not a component of any of the alternatives analyzed in the FEIS.
- 2. CSNC disagrees with eliminating the following alternatives from detailed study: Do not designate unauthorized routes; we disagree that not designating unauthorized routes fails to meet the Purpose and Need. Any unauthorized route proposed for designation should include an explanation of what unique experience it provides, as well as an analysis of adverse impacts

### Commenter 389

- **Response:** In Chapter 1 of the FIES, the Purpose and Need states that there is a need for limited changes to the system of ENF NFS roads and trails to provide routes that create loops and thru routes to enhance public wheeled motor vehicle recreational opportunities. In the Action Alternatives, 20 to 46 miles of unauthorized routes that are determined to provide excellent outdoor recreation opportunities for motorized and non-motorized users are proposed to be added to the NF transportation system. The potential adverse impacts of adding unauthorized routes to the system are analyzed and displayed in Chapter 3 of the FEIS.
- 3. CSNC disagrees with eliminating the following alternative from detailed study: Prohibit OHV Use; we disagree that this alternative fails to meet the Purpose and Need. Other forests have determined that they don't have to accommodate OHV trails.

#### Commenter 389

- **Response:** We believe that the ENF should provide access for both motorized and non-motorized users in a manner that is environmentally sustainable over the long term. The ENF is not reserved for the exclusive use of any one group, nor must every use be accommodated on every acre. It is entirely appropriate for different areas of the National Forests to provide different opportunities for recreation.
- 4. Chapter 1 fails to mention that part of the purpose and need is to address the increasing use of OHVs associated with the increasing population of the Sierra Nevada foothills.

## Commenter 725

- Response: The purpose of this project is to regulate unmanaged public wheeled motor vehicle travel, comply with U.S. District Court order, make limited changes to the ENF NFS roads and trails, and to comply with the ENF LRMP. In order to keep the scope of the project manageable and to be able to comply with the Court mandated timeline, the Forest Supervisor at the start of the project, John Berry, decided that construction of new routes would be outside the scope of this project. The National Travel Management regulations at 36 CFR 212.54 provide for revision of designations as needed to meet changing conditions, including the potential to add new routes following public involvement and site specific environmental analysis.
- 5. Here is the purpose and need for the project. "Provide a diversity of road and trail

opportunities for experiencing a variety of environments and modes of travel consistent National Forest recreation role and land capability." By closing the roads and trails for 5 months out of the year I think that they are ignoring the intent project.

#### Commenter 53

Response: Thank you for your comment. The proposed seasonal closure in Modified B is for three months, from January 1 to March 31. There are four elements to the Purpose and Need in Chapter 1 of the FEIS. The fourth component is the need to comply with the ENF LRMP. Standard and Guidelines, one of which requires a seasonal closure on all native surface roads

6. 2-person motorized cart (side-by-side ATV or utility cart) is not addressed in the draft. Failure would be in conflict with Purpose and Need for Action

#### Commenter 884

- **Response:** Thank you for your comment. The purpose of this project is to regulate unmanaged public wheeled motor vehicle travel, comply with U.S. District Court order, make limited changes to the ENF NFS roads and trails, and to comply with the ENF LRMP. It is the responsibility of the state of California to decide what vehicle types may be registered as "greensticker" vehicles.
- 7. Congressional oversight of all the proposed Alternatives will be necessary to insure that our regional area does not adopt measures that are overly restrictive and severely limit the rights of citizens to use their public lands. This "DEIS" is only focusing on restricting recreational vehicles, campsites and public access. The FS appears to be catering to special interests focusing on the smallest of the environmental issues and paring this alleged major impact report down to just recreational motor vehicle use. How about all the other polluters. Environmental issues should focus on the large-scale matters of great's importance.

#### Commenter 153

- Response: Thank you for your comment. The Travel Management Rule provides a set of evaluation criteria for designating roads and trails and considering the effects of route designation on National Forest System natural and cultural resources is a criterion. National Forests are managed by law for multiple uses. They are managed not only for preservation of natural values, water quality, wildlife habitat, endangered species, and biological diversity, but for timber, grazing, mining, and outdoor recreation. These uses must be balanced, rather than one given preference over another.
- 8. Fulfill your original charter: Stop representing corporate lobbyists and the extreme right wing of the Republican Party! Save our natural resources NOW!

#### Commenter 245

- **Response:** Thank you for your comment. The Travel Management Rule provides a set of evaluation criteria for designating roads and trails and considering the effects of route designation on National Forest System natural and cultural resources is a criterion. National Forests are managed by law for multiple uses. They are managed not only for preservation of natural values, water quality, wildlife habitat, endangered species, and biological diversity, but for timber, grazing, mining, and outdoor recreation. These uses must be balanced, rather than one given preference over another.
- 9. Please protect my forests and reduce the number of road and limit the area in which OHVs are allowed to operate.

## Commenter 254

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**Response:** Thank you for your comment. The Travel Management Rule provides a set of evaluation criteria for designating roads and trails and considering the effects of route designation on National Forest System natural and cultural resources is a criterion.

10. It (current roads) has worked for decades...why fix if it ain't broken?

Commenter 1020

**Response:** The Travel Management Final Rule (36 CFR 212, 251, 261, 295) requires that all National Forests ban cross-country travel and designate roads and trails for public motor vehicle use by class of vehicle and season of use.

# **Quiet Recreation**

1. OHV interferes with those who come to the forest to enjoy the relative absence of man-made noise, and who enjoy the natural sounds of the forest

Commenter 47, 216, 350, 359, 361, 382, 421, 873, 892, 894, 900, 1076

**Response:** Thank you for your comment. The Travel Management Rule provides a set of evaluation criteria for designating roads and trails for public wheeled motor vehicle use and considering the effects of route designation on National Forest System natural and cultural resources and conflicts among uses of NFS lands are two of the criteria. National Forests are managed by law for multiple uses. They are managed not only for preservation of natural values, water quality, wildlife habitat, endangered species, and biological diversity, but for timber, grazing, mining, and motorized recreation. These uses must be balanced, rather than one given preference over another.

2. ORVs are spoiling the vacations of many other visitors who come to the mountains to enjoy a quiet, wild place. It is time to stop the abuse of the ENF by unregulated ORVs.

### Commenter 175

Response: Thank you for your comment. The Travel Management Rule provides a set of evaluation criteria for designating roads and trails for public wheeled motor vehicle use and considering the effects of route designation on National Forest System natural and cultural resources and conflicts among uses of NFS lands are two of the criteria. National Forests are managed by law for multiple uses. They are managed not only for preservation of natural values, water quality, wildlife habitat, endangered species, and biological diversity, but for timber, grazing, mining, and motorized recreation. These uses must be balanced, rather than one given preference over another.

3. Do not neglect to keep in mind the needs of quiet recreationists who visit the ENF for hiking or simple camping, and need places for a quiet walk with their families. Family visitation can be very disturbed by having ORVs too close.

## Commenter 229

**Response:** Thank you for your comment. The Travel Management Rule provides a set of evaluation criteria for designating roads and trails for public wheeled motor vehicle use and considering the effects of route designation on National Forest System natural and cultural resources and conflicts among uses of NFS lands are two of the criteria.

4. I enjoy quiet, undisturbed areas and avoid areas frequented by off-road vehicles, as they kick up clouds of dust, fill entire drainages with noise, damage wildlife habitat, and degrade water quality.

Commenter 243

**Response:** Thank you for your comment. Chapter 3 of the FEIS summarizes the physical, biological, social, and economic environments of the project area and the effects of implementing each Alternative on that environment.

5. This is just plain WRONG. Quit supporting the selfish means of entertainment/amusement, while destroying what little peaceful and beauty that is left of our environment. Let these motorists use their filthy, noisy machines elsewhere.

#### Commenter 251

- **Response:** National Forests are managed by law for multiple uses. They are managed not only for preservation of natural values, water quality, wildlife habitat, endangered species, and biological diversity, but for timber, grazing, mining, and motorized recreation. These uses must be balanced, rather than one given preference over another.
- 6. Thank you for thinking of closing more trails. I'm sure that by closing more trails, you'll be putting more people together, who may like to go 4X4ing, But you are also putting others with them that like the peace and quite. I just can't wait until the quite is broken, and we're in the city, while on the back roads.

### Commenter 62

**Response:** Thank you for your comment.

7. Of particular concern in this regard is the presence of loud, obnoxious motorized trail bikes. The sound from these vehicles can be heard for great distances and is extremely objectionable and irritating. It makes it virtually impossible to enjoy the quiet and soothing sounds of nature. I cannot see any way in which OHV activities can be compatible with non-motorized use of public land.

## Commenter 89

- **Response:** Thank you for your comment. National Forests are managed by law for multiple uses. They are managed not only for preservation of natural values, water quality, wildlife habitat, endangered species, and biological diversity, but for timber, grazing, mining, and motorized recreation. These uses must be balanced, rather than one given preference over another.
- 8. Prioritize the protection of quiet recreation over the call for more unnecessary access. In California, quiet recreation contributes \$46 billion/yr to our economy; supports 408,000 jobs; generates \$3.1 billion in annual state tax revenue; and produces \$28 billion/yr in retail sales and services

Commenter 47, 359, 641, 873, 892, 894, 900

- **Response:** Thank you for your comment. National Forests are managed by law for multiple uses. They are managed not only for preservation of natural values, water quality, wildlife habitat, endangered species, and biological diversity, but for timber, grazing, mining, and motorized recreation. These uses must be balanced, rather than one given preference over another.
- 9. DEIS does not quantify the impacts of OHV noise vs. other sources, different OHV noise from other vehicles- there is a difference, frequency/duration not addressed, time of day, by setting-developed vs. primitive

Commenter 340, 348

- Response: Thank you for your comment. The recreation section in Chapter 3 acknowledges that a person's reaction to noise is not based solely on decibel levels but is also a reaction to the meaning and significance attached to it, as well as it's judged appropriateness. Please see Factors Affecting Response to Noise in Outdoor Recreational Environments by H.G. Kariel in The Canadian Geographer, Vol. 34, No. 2, 142-149 for more information.
- 10. DEIS p. 327, 343-344 does not consider the proximity of motorized roads and trails to areas

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and facilities used by non-motorized recreationists.

Commenter 348

Response: Thank you for your comment. We determined that the evaluation of potential noise impacts to quiet recreation users was to use the distance from proposed motorized routes, coupled with the size of available areas for quiet recreation relative to varying distances. Facilities used by non-motorized recreationists are, in general, accessed by motor vehicles. Therefore, considering the proximity of motorized roads and trails to non-motorized facilities does not quantify the effects of noise on non-motorized recreation.

11. Noise levels must be maintained under 75 decibels.

Commenter 153

**Response:** The California Vehicle Code, section 38370, governs noise emissions of OHVs operated on public land. For example, non-competition OHVs manufactured on or after 1/1/86 are limited to not more than 96 dBA and OHVs manufacture before 1/1/86 are limited to 101 dBA when measured from a distance of 20 inches.

12. Motorized use (in the Rubicon River area) conflicts with traditional quiet recreation - noise echoes in the canyon, and user conflicts

Commenter 346, 1024, 1075

**Response:** This area was identified during public scoping as one that various interests were concerned about. Certain users recommended that motorcycle use continue to be allowed on the trail as it provides a unique high country opportunity in a scenic setting. Others requested that the trail be closed to motorized use to allow for undisrupted non-motorized recreation. In order to display the effects of different management scenarios, this trail was proposed to be open or closed to motorized use in different ways in different alternatives. One of the factors considered in determining the different alternatives was conflicts between motorized use and other recreational uses as set forth in Executive Order 11644 and the evaluation criteria in the Travel Management Rule (36 CFR 212.55).

13. Hikers only hear noise for a short amount of time. If they want to ensure they do not hear any sounds other than nature, there are 140 miles of trails in the Wilderness.

Commenter 680

Response: Thank you for your comment.

# Recreation

1. When camping and backpacking (I do both), I seek and enjoy quiet, undisturbed areas where wildlife are able to exist in their natural habitat.

Commenter 254

**Response:** Thank you for your comment.

2. Would be disappointed if recreation opportunities go away.

Commenter 441

**Response:** One element of the purpose and need for this project is to provide for recreation opportunities associated with public wheeled motor vehicle use.

3. Recreationists of all types on forest will be negatively impacted by proposed route closures. Commenter 142, 420, 620

Response: Thank you for your comment. There may be negative impacts to both motorized and

non-motorized recreatiin on the forest when routes are closed. The Recreation section in Chapter 3 of the FEIS analyzes the effects of implementing each of the alternatives.

4. The ENF is important to me, both as someone who enjoys recreating in it and as someone who is concerned about the preservation of its unique natural values.

Commenter 253

Response: Thank you for your comment.

5. OHVers do not litter or damage trails

Commenter 764

**Response:** Thank you for your comment. We believe that many OHV enthusiasts have been responsible for much of the damage that has occurred on the ENF.

6. BCHC would like to emphasize the role of horses and pack stock within the ENF. For the time period during and after Euro-Americans came to the area, horses and pack stock are integral to the history and culture of the area prior to it becoming ENF in 1910.

Commenter 974

Response: Thank you for your comment. It is forest Service policy to provide a diversity of road and trail opportunities for experiencing a variety of environments and modes of travel consistent with the National Forest recreation role and land capability (FSM 2353.03 (2)). Modes of travel include hiking, horseback riding, bicycling, motor vehicle use, and so forth (FSM 2353.2).

7. Mountain quail hunting requires access to high altitude roads, plan does not address hunters needs

Commenter 426

**Response:** Thank you for your comment. Based on public comments, Alternative B was modified between the DEIS and FEIS in order to provide a higher level of access than Alternative D, which was the preferred alternative identified in the DEIS, while still minimizing impacts to certain resources. Modified B includes numerous routes in the high elevation range for hunting quail.

8. I'd like to see long loops that provide challenging terrain and allow a variety of users to enjoy without having to be dual-sport, and allow a full day of riding without traversing the same terrain - 80-100 miles of loops.

Commenter 1065

**Response:** Thank you for your comment. Currently the Rock Creek and Elkins/Gold Note areas offer the experience that you are looking for. Due to the road density that exist on this forest it is very difficult to provide this experience without having to be dual-sport.

9. Needs to incorporate at least one more alternative that is pro-recreation meeting future recreation needs and includes good dispersed camping.

Commenter 385

**Response:** Thank you for your comment. Based on public comments, Alternative B was modified between the DEIS and FEIS in order to provide a higher level of access than Alternative D, which was the preferred alternative identified in the DEIS, while still minimizing impacts to certain resources. The increased forest access includes additional spur roads and dead end routes in order to increase the dispersed camping opportunities.

10. The OHV community is very vocal, but only represents 7% of the visitors to the ENF. There are many citizens who enjoy use of the ENF without OHVs. Please choose an alternative that represents the best choice for all parties that recreate on the ENF. Support maximizing opportunities for non-motorized recreation.

Commenter 1056

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Response: Thank you for your comment.

11. Consistent with the DPR survey is a USFS survey cited in the DEIS, which found OHV users are a recreation minority. Table 8-83 of the DEIS (p. 321) tracks visitor activity participation and primary activity. According to this 2003 survey, 7.37 percent of ENF visitors participated in OHV activity; with OHV being the main activity for 3.34 percent. By contrast, 39.83 percent of ENF visitors participated in hiking/walking, with these being the main activity for 11.57 percent; almost four times as many as engaged in OHV use. Other popular non-motorized activities, including fishing, skiing, bicycling, backpacking, picnicking, non-motorized water, camping and simply relaxing far outnumber motorized recreation in popularity; [used as a source] Public Opinions and Attitudes on Outdoor Recreation in California 2002: An Element of the California Outdoor Recreation Planning Program. December 2003.

Commenter 389

**Response:** Thank you for your comment. National Forests are managed by law for multiple uses, including motorized and non-motorized uses. These uses must be balanced, rather than one given preference over another Therefore, one aspect of the purpose and need for this project is to provide for a variety of recreation opportunities associated with public wheeled motor vehicle use.

12. It is of prime importance the growing population be allowed to use their National Forests. There already are areas designated Wilderness within ENF that completely prohibit vehicles. Further prohibitions and restrictions of vehicles within the non-wilder

Commenter 974

Response: Thank you for your comment.

13. The FEIS and ROD must recognize that OHV, despite being used by only 7% of ENF visitors, requires management, maintenance, and law enforcement far out of proportion to the opportunity it provides.

Commenter 389

Response: Thank you for your comment.

# **Resources and Environmental Impacts (General)**

1. ORVers' argument is that they should be allowed to travel on unmaintained routes. That's wrong because maintenance is essential to protect the watershed and wildlife habitat.

Commenter 174

**Response:** The assumption used for the analysis in Chapter 3 was that NFS roads and trails designated for public wheeled motor vehicle use will be maintained as needed. In addition, the implementation strategy identifies that condition record forms will be used to document road and trail condition in order to develop a more effective maintenance strategy and assist in prioritizing maintenance needs.

2. The DEIS improperly segments the project, and fails to follow NEPA, because it fails to adequately address the cumulative environmental impacts of diverting off-road vehicles to other areas. If the Eldorado National Forest area is closed or further restricted, off-road vehicles that would have continued to use the long established trails in the Eldorado National Forest area will be diverted to other off-road riding areas. The potential impacts on other areas must be identified and their environmental impacts assessed and disclosed. No where in USFS's DEIS is there any meaningful discussion of the cumulative environmental impacts of the proposed USFS actions at Eldorado National Forest on the other off-road vehicle riding

areas.

#### Commenter 82

Response: The Council on Environmental Quality (CEQ) in 40 CFR 1508.7 defines "cumulative impact" as the impact on the environment which results from the incremental impact of the action when added to other past present and reasonably foreseeable future actions regardless of what agency or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time. The area analyzed in the cumulative effects analysis is usually not limited to the project area, and it varies with the resource or species being analyzed. The area considered will provide the appropriate context for reasonable determination of effects for a given resource. The cumulative effects analysis contained in Chapter 3 documents the analysis area, timing, and reasonably foreseeable future actions to be discussed in the environmental consequences.

The failure to include adequate data and analysis prevents compliance with NEPA; DEIS fails
to provide an objective understanding of significant environmental effects. Not only does the
DEIS fail to include sufficient data, but its analytical scope is insufficient in its failure to
address numerous effects.

#### Commenter 389

Response: Thank you for your comment. CEQ defines "Significantly" (40 CFR 1508.27) as used in NEPA requires considerations of context and intensity. Context means that the significance of an action must be analyzed in several contexts such as society as a whole, the affected region, the affected interests, and the locality. Significance varies with the setting of the proposed action. For instance, in the case of this site-specific action, significance would usually depend upon the effects in the locale rather than in the world as a whole. Both short and long-term effects are relevant. Intensity refers to the severity of impact. There are ten items listed in 40 CFR 1508.27 that should be considered in evaluating intensity. These intensity items are usually addressed when making a Finding of No Significant Impact. The analysis for this site-specific action does address the significant effects of the project area (locale) for both the short-term and long-term including the severity of the impact. In addition, the FEIS incorporates additional data and scientific references to supplement, improve, and modify the analysis.

4. Instead of permanently closing the trails, I would like to suggest alternating the areas of closure to prevent an environmental impact on them. Alternating the areas would accomplish the same thing without permanently closing them for all future use.

#### Commenter 798

Response: Thank you for your comment. This project is designed to establish a "backbone system" of designated routes that complies with the Forest's standards and guidelines. It is the intent of the Forest Supervisor to maintain the system of roads and trails open for use so that they can continue to be used. However, it is recognized that this travel management system is dynamic and allows for a yearly evaluation. Based on trail monitoring, public input, and budget constraints, new routes may be added to the system, existing routes may be removed from the system or rehabilitated, or the system may remain unchanged.

5. The comparison of alternatives is almost totally focused on how each enhances or restricts vehicle use, rather than how each reduces conflicts, minimizes resource damage or promotes restoration of the environment.

Commenter 389

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- **Response:** Thank you for your comment. Information on how each alternative reduces conflicts, minimizes resource damage, and promotes restoration of the environment has been added to the FEIS in Chapter 3.
- 6. It is outrageous that motorized vehicles could ever be allowed to tear up these back-country areas. One of these vehicles can do more damage than hundreds fo bicycles in a brief instant. Please support only non-motorized modes of travel in your beautiful forest. Anything else is to abuse the forest lands.

Commenter 164

Response: Thank you for your comment.

7. The negative impact to the forest as a whole is minimal considering the magnitude of use. With monitoring and minimal erosion control the future impact could be minimized without limiting use.

Commenter 168, 414

- **Response:** Thank you for your comment. The impacts to the forest resources are addressed in Chapter 3. The implementation strategy outlined in Chapter 2 addresses the need to monitor road and trail conditions to develop a more effective maintenance strategy and assist in prioritizing maintenance needs.
- 8. I absolutely know first-hand how vitally important it is to keep motorized vehicles out of sensitive areas--habitat, watersheds & wilderness-- to avoid damage to these fragile places. Here are a few areas where I have seen first hand the damage that OHVs have done through unauthorized use: 1. Rock Creek area of the Georgetown Divide. 2. Forestdale area where they typically don't stay on the road but enter the Wilderness area for their antics. 3. Rubicon Trail, especially circa Loon Lake area, especially in Winter

Commenter 47

Response: Thank you for providing first hand knowledge of impacts occurring on the Forest.

9. In principle, advocate the closure of all non-essential roads (former logging roads, etc.) on the El Dorado. The network of currently open roads on the Forest is extensive and many are unnecessary to maintain as a vehicle route. OHV use appears to be gaining popularity. This type of intrusive activity (noise, air and water pollution, disturbance to other recreationists and wildlife) needs to be closely managed and relegated to limited areas on public lands.

Commenter 52

- **Response:** Thank you for your comment. Based on this comment and other similar comments, Alternative B was modified to provide greater access for all classes of vehicles, comply with LRMP standards and guidelines, display rationale for eliminating use on ML-2 routes, and minimizing impacts to certain resources.
- 10. Opposed to the accommodation of motorized recreational activities in the national forests and on public lands generally, especially where the protection of the natural environment is an important consideration. There is ample evidence of the environmental harm off-the-road vehicle (ORV) use has caused on public lands everywhere it has occurred.

Commenter 89

**Response:** Thank you for your comment.

11. It is not clear which routes have been surveyed for sensitive plants, for wildlife issues, for cultural sites or noxious weeds. Where suitable habitat exists, presence must be assumed until surveys show otherwise, and routes within such areas cannot be considered for designation at this time.

Commenter 389, 417

**Response**: Thank you for your comment. Appendices G and H in the FEIS display the rationale for not allowing use on ML-2 and ML-1 roads. Sensitive plants, noxious weeds, wildlife and cultural resources are all aspects of that rationale.

12. Jeepers carry toilets and fire-prevention equipment so they have less impacts than hikers.

Commenter 867

Response: Thank you for your comment.

13. The erosion and noise from ORV's are disproportionate impacts from a relatively small number of users and need to be contained.

Commenter 878

**Response:** Thank you for your comment. National Forests are managed by law for multiple uses. They are managed not only for preservation of natural values, water quality, wildlife habitat, endangered species, and biological diversity, but for timber, grazing, mining, and outdoor recreation. These uses must be balanced, rather than one given preference over another.

14. The DEIS contains insufficient information regarding potential impacts to water quality, meadows, riparian areas, critical habitat, and watersheds at risk from increased cumulative watershed effects, also additional information is necessary to fully describe the Affected Environment, monitoring and enforcement commitments, and future follow-up actions

Commenter 333

**Response:** Thank you for your comment. We believe the analysis in Chapter 3 of the FEIS does sufficiently analyze the potential impacts to Forest resources of implementing each alternative.

15. Closure of trails to motorized use because of resource concerns does not eliminate the resource concerns. These are based on trail design and level of maintenance, not type of use.

Commenter 383

**Response**: Thank you for your comment. The Soil Resources section titled "Soil Loss on Native Surfaced Roads and Trails" in Chapter 3 of the FEIS explains the impacts that motorized use can have on Forest roads and trails. Also, erosion may continue on some closed routes, depending on how effectively they are closed and how well they recover without use but physically closing routes is beyond the scope of this decision.

16. OHVs are noisy, dusty, smell, are driven aggressively, tires tear into the earth, and their presence is invasive in natural surroundings.

Commenter 362

**Response:** Thank you for your comment.

17. One or two motorcycles on a trail can drown a picnicking family in dust and exhaust, can scare birds or wildlife from bird watchers or hunters, and can be dangerous to equestrians or mountain bikers.

Commenter 359

**Response:** Thank you for your comment.

18. User-created roads or trails have a host of impacts, from erosion and drainage issues to disruption of wildlife

Commenter 350

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- **Response:** Thank you for your comment. As stated in Chapter 1 of the FEIS, one aspect of the purpose of this project is to limit damage to Forest resources by banning cross country motor vehicle travel and redirecting this use to sustainable NFS roads and trails.
- 19. Off-road vehicles can do great damage to meadows, stream crossings, and plant life. They cause severe erosion, especially when users go cross-country.

Commenter 340, 382, 892, 896, 897, 898

**Response:** Thank you for your comment. The national Travel Management Rule requires the prohibition of cross-country travel. The analysis of the effects of public wheeled motor vehicle travel on Forest Resources is analyzed in Chapter 3 of the FEIS.

20. Restrict OHV's to areas already destroyed

Commenter 715

Response: Thank you for your comment.

21. Our public lands should be protected and preserved with special attention given to watersheds, sensitive habitats and unprotected wilderness areas.

Commenter 428, 640

- **Response:** Thank you for your comment. As stated in Chapter 1 of the FEIS, one aspect of the purpose of this project is to limit damage to Forest resources by banning cross country motor vehicle travel and redirecting this use to sustainable NFS roads and trails.
- 22. DEIS does not provide any analysis of the effects of going from an open trail system to a designated trail system. The lack of analysis has not provided any meaningful mitigation credit for reevaluating wildlife disturbances in decision-making process.

Commenter 386

- **Response:** Thank you for your comment. The analysis in the environmental consequences section has been supplemented to improve the discussion of effects related to cross country travel.
- 23. DEIS fails to include the required info and public disclosure of the environmental benefits of eliminating motorized vehicle cross-country travel and restricting that use to designated roads, trails, and areas. Should include at a minimum the evaluation of impacts to soils, flora, fauna, etc.

Commenter 385

- **Response:** Thank you for your comment. The analysis in the environmental consequences section has been supplemented to improve the discussion of effects related to cross country travel. The analysis of the effects of public wheeled motor vehicle travel on Forest Resources is analyzed in Chapter 3 of the FEIS.
- 24. While off-roading can be fun, momentary pleasure can have a high price in delicate ecosystems. Where are your priorities?

Commenter 252

- **Response:** Thank you for your comment. As stated in Chapter 1 of the FEIS, one aspect of the purpose of this project is to limit damage to Forest resources by banning cross country motor vehicle travel and redirecting this use to sustainable NFS roads and trails.
- 25. No effort was made to determine what, if any, long term damage was being caused by OHV use on existing trails and no reason was given for closing many of the roads and trails in the alternatives.

Commenter 1, 1047

Response: Thank you for your comment. Appendix G contains the rationale for each ML-2 road that was eliminated in Modified B. Also, Appendix H shows the rationale for considering allowing use on ML-1 roads. The Alternative Development section at the beginning of Chapter 2 in the FEIS describes the process for developing the range of alternatives, including allowing public wheeled motor vehicle use on trails. Chapter 1 lists the applicable ENF LRMP standards and guidelines that apply to the designation and use of routes. Also, several resource analyses in Chapter 3 discuss specific routes and the issues associated with them. For example, the Inventoried Roadless Areas and Water and Riparian Resources sections.

26. With more than 2,000 miles of existing roads and trails already in the forest it only seems reasonable to expect the FS to protect the remaining natural areas of the forest for plant and wildlife habitat, water quality and question recreation uses.

# Commenter 247, 892

- **Response:** Thank you for your comment. As stated in Chapter 1 of the FEIS, one aspect of the purpose of this project is to limit damage to Forest resources by banning cross country motor vehicle travel and redirecting this use to sustainable NFS roads and trails.
- 27. Closing routes will be bad in the long run as it will decrease the buy-in for protective measures and funding support that are vital to keeping the Forest system functioning.

#### Commenter 773

- **Response:** Thank you for your comment. As stated in Chapter 1 of the FEIS, one aspect of the purpose of this project is to limit damage to Forest resources by banning cross country motor vehicle travel and redirecting this use to sustainable NFS roads and trails.
- 28. Concerned opening new roads for ORV in the NF due to noise, pollution, trash, and erosion. Commenter 1048

**Response:** Thank you for your comment. It is true that some unauthorized routes cause environmental damage. However, some unauthorized routes are well sited, provide excellent opportunities for outdoor recreation for both motorized

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routes that provided a unique recreation opportunity (such as high elevation trail experience), enhanced the recreation experience by connecting routes or areas, provided access to an area of interest, or allow access to dispersed camping. The ecological importance of meadow habitat was considered and the number of routes crossing meadows was minimized.

31. Resource preservation the top priority, and recreational vehicle access as a second priority, in making your decision regarding OHV routes on the ENF.

Commenter 459, 1061

- **Response:** Thank you for your comment. As stated in Chapter 1 of the FEIS, one aspect of the purpose of this project is to limit damage to Forest resources by banning cross country motor vehicle travel and redirecting this use to sustainable NFS roads and trails.
- 32. Routes that increase access to sensitive areas, meadows, and streams should be closed.

Commenter 1050

- **Response:** Thank you for your comment. Each alternative includes routes that were eliminated for each of these reasons. Appendix F includes the rationale for elimination of routes in Modified B which includes each of the reasons listed above.
- 33. Environmental issues should focus on large-scale matters, and not focus on one use of the forest.

Commenter 153

- **Response:** Thank you for your comment. As stated in Chapter 1 of the FEIS, one aspect of the purpose of this project is to limit damage to Forest resources by banning cross country motor vehicle travel and redirecting this use to sustainable NFS roads and trails.
- 34. All the talk in the DEIS about OHV trail damage is nothing more then typewriter fluff. I have witnessed with my own eyes the USFS allow logging companies to come in the Tahoe and Eldorado forest for thinning operations and blow away entire small dirt bike trails. You are professing that our dirt bikes due damage then at your ignorance you allow the logging thinning operations come in and cut 15' wide road through where our small trail was.

#### Commenter 73

- **Response:** Thank you for your comment. Logging operations have damaged existing trails in the forest. The logging operations were also responsible for repairing the trails. Damage is occurring on trails from OHV use as well.
- 35. DEIS did not address the need for the Forest ORV planning process to require coordination of any projects effecting existing routes such as forest health projects, timber and brush thinning, habitat improvement projects, timber ha

#### Commenter 386

Response: Thank you for your comment. The Alternative Development section at the beginning of Chapter 2 in the FEIS describes the process for developing the range of alternatives, including allowing public wheeled motor vehicle use on trails. Chapter 1 lists the applicable ENF LRMP standards and guidelines that apply to the designation and use of routes. Also, several resource analyses in Chapter 3 discuss specific routes and the issues associated with them. For example, the Inventoried Roadless Areas and Water and Riparian Resources sections.

37. I do not feel that occasional vehicle use on a given route should be considered to have the same level of impact as regular vehicle use, nor should it be viewed in the same way as regular OHV use of a route.

#### Commenter 52

- **Response:** Thank you for your comment. One assumption identified at the beginning of Chapter 3 and used in the analysis is that NFS roads and trails are in an acceptable condition, unless information exists to the contrary.
- 38. I think an answer to that would be limit the size of the tires to 35" and the axle size to small pick-up size and no full size axles, no full size vehicles! The wider the axle the bigger the tire, the more they are going to attempt.

Commenter 57

Response: Thank you for your comment.

39. One serious problem with the DEIS is its failure to identify standards or thresholds for measurement of impacts. The document contains reams of data, but many sections lack standards or objectives by which to not only compare impacts among the Alternatives, but to quantify the effects of each of the alternatives on the resource under discussion. As a result, the public has no way of knowing when the level of impact becomes significant.

## Commenter 1042

**Response:** Thank you for your comment. Comments on the DEIS have been used to supplement the analysis in Chapter 3. Where possible the analysis in Chapter 3 (affected environment) documents the thresholds that are identified in the LRMP and/or federal/state/county standards.

40. Cattle and logging do more damage than OHVers

Commenter 426

**Response:** Thank you for your comment.

41. FS should not designate now based on future projected OHV use.

Commenter 421

**Response:** Thank you for your comment. As stated in Chapter 1 of the FEIS, one aspect of the purpose of this project is to limit damage to Forest resources by banning cross country motor vehicle travel and redirecting this use to sustainable NFS roads and trails.

42. Assumptions in Ch. 3 does not take into consideration the impact a different type of use will have on the remaining trails.

Commenter 755

**Response:** Thank you for your comment. Based on comments received on the DEIS, the assumptions in Chapter 3 were modified.

43. It is not sufficient to assert that only those projects currently on the Forest Schedule of

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Proposed Actions are foreseeable projects

Commenter 389

**Response:** Thank you for your comment. The list of projects has been updated to include those that are in any stage of project planning and those for which decisions have been made and are awaiting implementation, regardless of what agency or person is planning or undertaking the aother actions and regardless of land ownership on which the other actions occur.

44. Roads with following characteristics should be closed: too steep to be easily maintained, no purpose or discernable destination, multiple routes going the same destination, parallel routes, where road density is high, insufficient erosion control, passing through higher elevation meadows.

Commenter 1034

**Response:** Thank you for your comments. Many of these items were taken into account when determining which routes would be eliminating. Appendix F contains the rationale for eliminating routes in Modified B.

45. Common sense trumps bunk science and EIS's. Trees are renewable. Rain causes erosion more than wheeled vehicles ever could in a million years.

Commenter 186

Response: Thank you for your comment.

46. Adhere to tread lightly principals and remove any trash we find.

Commenter 215

Response: Thank you for your comment.

# Resource and Environmental Impact (specific)

1. Exhaust and leakage of pollutants from OHV's caused degradation in areas of Spider Lake and Loon Lake

Commenter 340, 346, 376, 894

**Response:** One of the purposes of the Travel Management regulations and this Forest travel management project is to restrict motor vehicle travel to specific roads and trails to avoid degradation of valuable forest resources such as clean water.

ORV's created 500 miles of unauthorized trails that have degraded the public values of the forest

Commenter 340, 346, 376

**Response:** There are many factors that contributed to the development of unauthorized routes. The degradation of public values was taken into consideration when determining which routes would remain open to public wheeled motor vehicle access.

3. On Caples Creek Trail we saw it rutted by dirt bikes, and cannot understand why such an incompatible use of fragile resources would be considered. It's hard to imagine Hunter's Trail in any better condition. Please protect these sensitive areas from unnecessary degradation.

Commenter 1071

**Response:** Your concerns were taken into consideration when modifying Alternative B.

4. We contend that the District Evaluation Forms should have been included as part of the DEIS, or a valid summary of the same, so that the public had the opportunity to evaluate the material used for analysis.

### Commenter 389

**Response:** The brief description of the District evaluations included in the introduction of Chapter 3 of the FEIS has been expanded to better describe the type of information that is found in this database. The records themselves were considered to be too detailed to be a part of the FEIS, and are retained as a part of the project record. The information from these District evaluations is also incorporated in Appendix F (for ML-2 roads in Modified B) and Appendix G (for ML-1 roads).

5. We are disappointed to find that route specific analysis falls far short of what the public was promised. We were told that the Forest Service staff would look at every route proposed for designation. We were also told that analysis would be done "in a fish bowl." Such transparency has not materialized. The EIS discloses no site-specific analysis of impacts; merely a listing of routes proposed under each Alternative (DEIS Appendix F). This is not a big improvement over the fatally-flawed ORV designation process done in 1990. According to the DEIS, GIS information was used, but not ground-truthed. The route evaluation sheets filled out by District staff fall short of meeting the standard for analysis for a number of reasons:

The sheets were completed in an office exercise, without the required and promised ground truthing;

Data collection was limited to criteria regarding OHV opportunity offered, route condition, gate or barriers and designation recommendations;

Designation recommendation choices do not include a "do not designate" option. Rather, the reviewers are asked which types of OHV use they recommend for the route.

There is no analysis of existing or potential conflicts with non-motorized recreationists;

There is no analysis of existing or potential conflicts with wildlife;

There is no analysis of existing or potential conflicts with cultural sites;

There is no analysis of existing or potential conflicts with sensitive plants;

There is no analysis of existing or potential risk of spreading noxious weeds.

The "District Answers to OHV Route Questions," which is the only site specific route analysis for proposed routes, is inadequate.

## Commenter 389

Response: The data collection forms were only one of the items used in the analysis of impacts on resources. Each resource used existing information concerning impacts associated with public wheeled motor vehicle use. This information comes from a variety of field-data based sources, such as vegetation mapping, inventories of cultural resources, ongoing monitoring of wildlife species occurrences and activity, including occupied nest sites, presence of sensitive amphibian populations, etc. Analysis of existing and potential conflicts with nonmotorized recreationists can be found in the Recreation section, pages 3-269 to 3-302. Analysis of existing and potential conflicts with wildlife can be found in the Terrestrial Wildlife section, pages 3-81 to 3-160. Analysis of existing and potential conflicts with cultural resources can be found in the Heritage Resources section, pages 3-259 to 3-264. Analysis of existing and potential conflicts with sensitive plants can be found in the Endangered, Threatened, and Sensitive Plant Species section, pages 3-55 to 3-75. Analysis of existing and potential conflicts risks of spreading noxious weeds can be found in the Noxious Weed Risk Assessment section, pages 3-77 to 3-80.

6. DEIS does not provide the required (E.O. 11644) site specific analysis and rationale for each of the proposed trail closures; full range of alts and include analysis and planning commitments to provide areas like Elkins Flat and Gold Note with a site-specific

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management decision.

Commenter 385, 386, 637

- Response: The effects analysis for trail closures proposed in each alternative are presented in the Recreation section in Chapter 3 of the FEIS. Appendix F contains rationale for each proposed road closure under Modified B. The comparison of alternatives discussion in Chapter 2 of the FEIS has been revised to address the criteria for designation in the national Travel management regulations, which are derived from E.O. 11644.
- 7. CSNC did provide comment on some specific routes with which we had concerns. It is a great disappointment to see that those comments were not taken into account in the Forest's own analysis of those routes. The Forest has proposed to designate some routes with total disregard of evidence of severe damage.

Commenter 389

- **Response:** The information provided by CSNC was considered in the development of the alternatives and was incorporated into Alternative E. The information provided during the DEIS comment period, concerning damage to routes, was taken into consideration when modifying Alternative B. In addition, the information was incorporated into the analysis for Hydrology and Aquatic Resources in Chapter 3.
- 8. Monitoring will need to occur- identifying specific OHV roads and trails to be used as a monitoring reference will simplify the Forest's management and monitoring programs, and help focus resources where they are most needed- the final EIS should detail a specific plan of representative indicator management.

Commenter 378, 766

- **Response:** Thank you for your comment. The Monitoring Strategy in Chapter 2 of the FEIS outlines the monitoring that will occur once the designated route system is implemented. The implementation strategy outlined in Chapter 2 of the FEIS identifies a public volunteer strategy be developed within six months of the final decision. We plan on working collaboratively with stakeholders to develop a sustainable volunteer program to help with trail maintenance, monitoring, and public education.
- 9. Feel visitor use surveys were taken with a bias and do not represent/include OHV groups accurately.

Commenter 766

- **Response:** Thank you for your comment. The Forest Service completed visitor use monitoring in 2003, using the national visitor monitoring procedures and protocols. The findings from that survey were used to assist in describing the existing recreation visitation condition and in evaluating the effects of implementing the different alternatives.
- 10. Was there a survey done in the Blue Lakes and Indian Valley areas to indicate what the public use was? Conduct an actual survey, not 'official' ENF meeting- Ask, on the ground, people from the area, what activities they come to forest to enjoy. Surveys need to be site specific.

Commenter 380

Response: Thank you for your comment.

11. The proposed closures are arbitrary. The DEIS provides and applies no science or methodology when closing routes. The DEIS should describe the methodologies used and document the science.

Commenter 601

Response: The explanation on how the alternatives were developed can be found in the Description of Alternatives in Chapter 2 of the FEIS. Each of the alternatives was developed to address the significant issues raised by the public in different ways. Various resource concerns were considered in the development of each of the alternatives, along with a spectrum of recreation opportunities. The effects of implementing each of the alternatives are presented in Chapter 3 of the FEIS, including references to relevant scientific studies. Some of these relevant studies were also used in the development of alternatives to provide information related to individual resources.

12. All of the Alternatives reduce OHV opportunities. There is no analysis to show the impacts associated with an increase in OHV opportunities; there might be a lessening of impacts with an increase in opportunity. How can an intelligent decision be made without an adequate comparison and contrasting of impacts associated with increasing opportunities.

#### Commenter 352

- Response: The explanation on how the alternatives were developed can be found in the Description of Alternatives in Chapter 2 of the FEIS. In Chapter 1 of the FEIS, the cope of the analysis is described. At the beginning of this Travel Management project, the Forest Supervisor determined that the analysis would not consider the construction or development of new routes. Chapter 3 of the FEIS presents the effects of implementing each of the alternatives in order to provide the comparison and contrasting of impacts associated with each alternative. The summary comparison of alternatives in Chapter 2 of the FEIS has been strengthened to provide a clearer comparison in relation to the criteria for designating roads and trails for public wheeled motor vehicle use.
- 13. The analysis lacks proper, reasonable evidence to back the decision to close routes.

## Commenter 360

- **Response:** The environmental consequences descriptions in Chapter 3 of the FEIS describe the effects of allowing public wheeled motor vehicle use on various routes, or prohibiting that use across the various alternatives. Appendix F has been modified to include the rationale for each NFS ML-2 road proposed for closure in Modified B, and Appendix G has been added to display the rationale for allowing use or not allowing use on NFS ML-1 roads.
- 14. There is no analysis or meaningful discussion regarding dispersed camping or big game retrieval.

## Commenter 360

- **Response:** Dispersed camping and big game retrieval are not a part of this decision. The Implementation Strategy presented in Chapter 2 of the FEIS describes that a process for designating areas for public motor vehicle use of dispersed camping areas will be developed following the release of the FEIS and ROD.
- 15. The DEIS lacks any description of the activities it seeks to regulate- OHV use is comprised of many different users- single track vs. ATV vs. rock-crawlers- DEIS must detail what it proposes to regulate.

### Commenter 378

- Response: In Chapter 1 of the FEIS, it is explained that this Travel Management project addresses where all public wheeled motor vehicle use will be allowed on the Eldorado National Forest. This includes highway and non-highway legal vehicles, including motorcycles, ATVs, 4WDs, and passenger vehicles. Many of these terms are defined in the Glossary section of Chapter 4, and in the national Travel Management regulations.
- 16. There are no OHV experts or resources cited in the bibliography.

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## Commenter 378

Response: The Forest Supervisor established the Interdisciplinary Team based on the knowledge skills and abilities of the employees, and with consideration of the resource areas to be addressed in the analysis. The interdisciplinary team utilized all available information, including information collected from the public during the extensive public involvement process associated with this project to provide an understanding of the public's desires for wheeled motor vehicle access and recreation. Specific literature used in the analysis presented in Chapter 3 of the FEIS is cited in the References list in Chapter 4 of the FEIS.

17. Cross-country travel is no longer permitted on the Eldorado, yet trail-based OHV recreation is being managed as if it were cross-country travel.

#### Commenter 378

**Response:** As stated in Chapter 1 of the FEIS, the purpose and need for this Travel Management project is to stop resource damage from the use of inappropriate routes and cross country motor vehicle travel and to redirect this use to sustainable NFS roads and trails. Contrary to the commenters statement, motorized use of trails is not being managed as if it were cross country travel; rather this project will identify the specific trails where public wheeled motor vehicle use will be allowed.

18. Route inventory may be incomplete.

### Commenter 71

Response: The Forest conducted an extensive effort to inventory the existing routes on the forest that were continuing to receive wheeled motor vehicle use. Public meetings and open houses were held to inform the public about the inventory and to receive comments on the inventory. The inventory was posted on the forest's website, and many comments were received from the public. Missing routes identified by the public were visited and were added to the inventory where appropriate. Some unauthorized routes were no longer used by wheeled motor vehicles, and so were not included in the inventory.

19. Impossible to comply with ENF request for specifics on hundreds of miles of proposed closures

#### Commenter 8

**Response:** Numerous individuals responded to the DEIS supplying comments on specific routes to allow use or close and comments on specific elements of the analysis that require additional information.

20. Many modifications are suggested in multiple sentences in Chapter 3 of the DEIS regarding the Indicator Measures and effects analysis for different resource areas;

## Commenter 461

**Response:** The suggested edits to the effects analyses were reviewed, but were not incorporated because the text adequately reflected the results of the analyses.

21. Alt E maximizes the protection of Endangered, Threatened, and Sensitive plant species by reducing the motorized encroachment near these species

### Commenter 381

Response: The Forest Service agrees that Alternative E provides the maximum protection to TES plant species, affecting the least number of sensitive plant occurrences and having the least number and fewest miles of designated routes within potential sensitive plant habitat. Layne's butterweed (Packera [Senecio] layneae) is the only plant species with federal listing known to occur on the Eldorado National Forest. No routes proposed for designation occur within 300

feet of known occurrences; therefore, no alternatives would have an effect on Layne's butterweed.

 DEIS does not address impacts to aquatic or insect species, sensitive species, noxious weeds, native plants

## Commenter 419

- **Response:** The effects analysis for endangered, threatened, and sensitive plants and animals and the noxious weed risk assessment were completed in compliance with NEPA and ESA standards. Executive Order 11644 and Forest Service regulations define no higher standards. At the beginning of the project, the Forest Supervisor directed the interdisciplinary team resource specialists to use existing data to analyze effects to Sensitive plant and animal species and from noxious weed species.
- The Endangered, Threatened, and Sensitive Plant Species section of the FEIS addresses effects to Sensitive plants under each alternative. In addition, the FEIS addresses effects to potential habitat, particularly meadows and lava cap that support Sensitive plants. This effects analysis describes that impacts to Sensitive plants and their potential habitat have occurred from OHV use and that Alternative E, by reducing the overall number of designated routes in potential Sensitive plant habitat, would reduce the potential for impacting sensitive plants and particularly meadow habitats. The Terrestrial Wildlife and Aquatic Wildlife sections of the FEIS describe the impacts to sensitive terrestrial or aquatic wildlife. The expectation of the travel management project is that any action alternative would reduce effects to Sensitive plants below the current level.
- The existing ENF weed database used in the noxious weed risk assessment emphasizes the ENF List A species, which are considered highly invasive, but also includes data on ENF List B species, which are not currently believed to be as aggressive as species on ENF List A. Limitations and assumptions of the existing ENF weed database are discussed within the noxious weed risk assessment as noted in these comments. Alternative E, by designating the fewest miles of ML1 and ML2 roads that are known to be infested, best reduces the risk of introducing or spreading noxious weeds.
- 23. A list of routes was provided recommending that the list of routes should not be designated. The list displayed route number, location, and rationale for not designating. Additionally the commenter requested that routes in IRAs, recommended wilderness, or potential wilderness should not be designated.

Commenter 389, 979

- **Response:** A few of the routes identified by the commenter were NFS ML-3 to ML-5 surfaced roads. Motorized use of NFS ML-3 to ML-5 surfaced roads was not reconsidered in this analysis. Existing NFS ML-3 to ML-5 surfaced roads managed for standard four wheel passenger vehicles are already regulated by state and federal law. The DEIS contained misleading information concerning existing NFS ML-3 to ML-5 surfaced roads which has been corrected in the FEIS.
- A few of the routes identified by the commenter were listed as inconsistent with the RCO analysis. The RCO analysis has been modified to address the analysis of unauthorized routes only. Both Modified B and Alternative E are consistent with the RCO analysis and LRMP.
- A few of the routes identified by the commenter were in conflict with IRAs, recommended wilderness, and potential wilderness. Discussion on routes in IRAs, recommended wilderness, and potential wilderness can be found in Wilderness and IRA sections of this appendix.

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The following tables display the specific routes identified and the disposition of that road or trail in Modified B.

1. Routes within Inventoried Roadless Areas recommended to not allow motor vehicle use

CSNC	Mod B
14E04	Open
14E11	Open
17E12	Open
17E16*	Open
17E17*	Open
17E19	Open
17E21*	Open
17E23	Closed
17E24	Open
17E28	Open
17E51	Closed
17E52	Closed
17E71	Closed
11N09A*	Open
11N26F	Open
08N03F	Open
NSR0803F-A	Closed
NSR1109-A	Open
NSR1268-A	Closed
NSR1312-A	Closed
NST1322-BA	Closed
NST1712-A	Closed
NST1716A-A	Closed
NST1716A-B	Closed
NST1724-D	Closed
NST1752-A	Closed
NST1763-A*	Closed

<sup>\* =</sup> routes also identified in comments from California Wilderness Coalition

# 2. Routes within potential Wilderness areas

CSNC	Mod B
10N13	Open
10N13A	Closed
10N13B	Closed
10N13C	Closed
11N21*	Closed
11N26E	Portion closed
11N28	Portion closed
11N28A	Open
11N28B	Open
13N43	Closed
13N43A	Closed
13N43B	Closed
13N43C	Closed
14N39	Open
08N03FS	Closed
08N03FW	Open
08N16C	Closed
08N16D*	Open
08N83	Open
08N83C	Open
NSR0883-A	Closed
NSR0982B	Closed
NSR1013	NSR1013-B Open
NSR1126A	Closed
NSR1128D	Portion closed
NSR1128E	Open
NSR1439-A	Closed
NSR1439-C*	Closed
NSRELD147M	Closed

<sup>\* =</sup> routes also identified in comments from California Wilderness Coalition

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# 3. Routes with Riparian Impacts

CSNC	Mod B
14E09	Open
14E10	Closed
17E12	Open
17E16	Open
14E25	Open
17E51	Closed
10N01	Open
10N10	Closed
10N13	Open
10N13A	Closed
10N13B	Closed
10N13C	Closed
10N14	Open
10N14B	Portion outside of meadow open
10N21	Open
10N50	Outside decision to be made
10NY06	Open
11N09A	Open
11N22	Open
11N23	Outside decision to be made
11N23F	Open
11N23P	Closed
11N26	Outside decision to be made
11N37	Outside decision to be made
11N63	Open, portion within RNA closed
11N64	Open to highway vehicles only
12N57	Open
12NY15	Open
13N72A	Open
14N05	Open
14N06	Open
14N27	Open

14N39	Open
08N05L	Portion outside of RCA open
09N01	Open, except segment at end of road closed
09N03	Closed
09N04	Open
09N12	Closed
09N34F	Closed
09N82	Open
09N83	Open
09NY22	Open
NSR1014-AB	Closed
NSR12Y32A-A	Closed
NSR1439-CA	Closed
NSR1439-CA	Closed
NSRALP114-A	Closed
NSRALP16-AB	Closed

# 4. Routes impacting biological resources

CSNC Mod B
NST1712-A Closed

5. Routes causing on-the-ground resource impacts

CWC	Mod B
08N43	Open
09N45D	Closed
09NY22	Open
10N14G	Open
10N46H	Open
10N55Q	Closed
11N22	Open
11N26CN	Closed
11N28	Portion closed
11N36A	Closed
11N37F	Portion closed

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17E51 Closed17E71 Closed

6. Routes impacting non-motorized recreation

CSNC	Mod B
14E04	Open
14E11	Open
17E12	Open
17E19	Open
17E23	Closed
17E72	Closed
11N26F	Open
09N34F	Open
09N83	Open

7. Routes considered to not have recreational value

CWC	Mod B
10N46L	Open
10N80	Closed
11N39A	Open
12N47B	Open
NSR1439B	Closed
NST1763A	Closed

# **Rock Creek**

1. I request the Rock creek area be retained and managed for motorized, particularly for dirt bikes.

Commenter 208, 565, 1105

**Response:** The Travel Management FEIS does not include the Rock Creek Recreational Trails Area. The 2006 Record of Decision and Supplemental Environmental Impact Statement was a separate decision for the Rock Creek Recreational Trails Area and will continue to be implemented. It provides for OHV access with an emphasis on routes designated for motorcycles.

# Seasonal Closure

1. I believe that "Seasonal Closure" proposals are against the forest services own rule. The closure of our public lands from any segment of tax paying citizenry is not a responsible management plan, but a violation of my constitutional rights.

Commenter 72, 75, 76, 79, 81, 85

**Response:** Thank you for your comment. The Eldorado National Forest Land and Resource Management Plan requires that a seasonal closure be instituted during wet weather periods to reduce damage to native surface roads and trails. A seasonal closure is proposed in alternatives B through E, including Modified B.

2. Opposed to seasonal closures

Commenter 92, 130, 131, 135, 136, 145, 282, 398, 436, 442, 450, 454, 565, 677, 1107, 1108, 1109

**Response:** Thank you for your comment. The Eldorado National Forest Land and Resource Management Plan requires that a seasonal closure be instituted during wet weather periods to reduce damage to native surface roads and trails. A seasonal closure is proposed in alternatives B through E, including Modified B.

3. Close to any OHV use from November through April, as these mid season months are those during which most erosion and damage to roads and trails are likely to occur.

Commenter 643, 644, 647

Response: Thank you for your comment. Alternative C proposes a seasonal closure from November 1 to April 30. Appendix D has been added to the FEIS to further explain the basis for the seasonal closure and the proposed time periods. The Forest Supervisor will still have the authority to implement Forest Orders closing native surface roads outside of the seasonal closure period, when conditions warrant.

4. The implementation of the seasonal closure and prohibiting cross country travel will mark a substantial improvement of your ability to control the negative effects of motor vehicle use on a broad array of resources.

Commenter 381

**Response:** Thank you for your comment. Appendix D has been added to the FEIS to further explain the basis for the seasonal closure and the proposed time periods. Chapter 3 outlines the effects of prohibiting cross-country travel in each of the action alternatives.

5. Seasonal Closures will help minimize OHV's going many places

Commenter 344

**Response:** Thank you for your comment. The Eldorado National Forest Land and Resource Management Plan requires that a seasonal closure be instituted during wet weather periods to reduce damage to native surface roads and trails. A seasonal closure is proposed in alternatives B through E, including Modified B.

6. I am against any seasonal closure. Snow wheeling is both necessary for me and enjoyable. I access my private property along the Rubicon in the snow and need to still access my land.

Commenter 1064

**Response:** Thank you for your comment. The Eldorado National Forest Land and Resource Management Plan requires that a seasonal closure be instituted during wet weather periods to reduce damage to native surface roads and trails. Access to private land is recognized in the national Travel Management regulations (36 CFR 212.6(b)).

7. Please do not enact any sort of seasonal closure.

Commenter 23, 651, 737

**Response:** Thank you for your comment. The Eldorado National Forest Land and Resource Management Plan requires that a seasonal closure be instituted during wet weather periods to reduce damage to native surface roads and trails.

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8. The USFS has no factual based science for winter closures. The proposed wet season closures are arbitrary and not based on actual condition assessments. These closures will concentrate riders on fewer trails. We want rain gage based temporary closures not seasonal closures of OHV trails. It is a policy of convenience that avoids actual management of the forest. "Forest-wide S&G - practice 27 states that a wet-weather plan will allow for trails to be open when soil conditions permit." The proposed seasonal closure method does not allow for trails to be opened when soil conditions permit.

Commenter 53, 87, 154, 176, 199, 208, 220, 221, 242, 461, 1028, 1046, 1047, 1084

- Response: Thank you for your comment. The seasonal closure is needed to meet Forest Plan standards and guidelines that require a seasonal closure during wet weather periods on unsurfaced routes. Seasonal closures on such routes are intended to protect the condition of the routes, as well as prevent soil erosion, rutting and other resource damage. Such protection will reduce resource damage and maintenance costs on routes in the future. Appendix D was added to the FEIS to provide the basis for the period of closure. As described in Appendix D, the closure period is based on rainfall data and soil moisture conditions associated with the critically dry water year type. Consistent with ENF LRMP Standard and Guideline for Management Practice 27, this will provide the minimum closure and allow for trails to be open at other times when conditions permit. The Forest Supervisor may promulgate Forest Orders at other times of the year to close roads or trails due to wet weather conditions, when conditions warrant.
- 9. I must state my objection to the concept of a "seasonal closure". I understand the need for a "wet weather" closure; I completely disagree that a seasonal closure is the way to comply. A seasonal closure is in direct conflict with the standard and guideline which states "the plan will allow for trails to be open when soil conditions permit". Alternatives "C" and "D" allow for the possibility to temporarily open roads and trails if soil conditions permit during the months of November, December and April, all of the action alternatives have a "Core" closure period of January, February, and March which does not allow for opening roads or trails regardless of soil condition. A temporary closure policy that is based on actual conditions on the ground would best address the need for wet weather closure.

# Commenter 152

- Response: Thank you for your comment. Appendix D was added to the FEIS to provide the basis for the period of closure. As described in Appendix D, the closure period is based on rainfall data and soil moisture conditions associated with the critically dry water year type. Consistent with ENF LRMP Standard and Guideline for Management Practice 27, this will provide the minimum closure and allow for trails to be open at other times when conditions permit. The Forest Supervisor may promulgate Forest Orders at other times of the year to close roads or trails due to wet weather conditions, when conditions warrant. The provisions to allow for opening of roads and trails during the months of November, December, or April in Alternatives C and D were intended to be implemented by delaying closures in the late Fall to early Winter season, or to open routes early in April, rather than to open and close routes for shorter periods (such as for several days to several weeks).
- 10. Regulation of a season is bull, especially during the season proposed. Dec. 1 to April 30th is the season in which we all ride. Anything beyond this time is now in the fire season. It should be reversed because after about June 1st it's too hot and dusty, there are tons of people camping, and the fire danger is high. After November it begins to cool down and it is after deer hunting season, and this is the optimal time when the ground is cool and moist, not dusty, and the weather is cool. You have it backwards.

Commenter 61, 67, 84

Response: Thank you for your comment. It is recognized that many riders enjoy riding in the Fall to early Spring period because of the cooler temperatures, lack of dust, and fewer visitors. The seasonal closure is needed to meet Forest Plan standards and guidelines that require a seasonal closure during wet weather periods on unsurfaced routes. Seasonal closures on such routes are intended to protect roads and trails from damage when the travel tread cannot support the vehicle use, as well as to prevent rutting, soil erosion, and other resource damage. Such protection will reduce resource damage and maintenance costs on routes in the future. There are a significant number of days available for riding between the common end of the hot, dry season in late-September and the beginning of the wet weather seasonal closure. Appendix D was added to the FEIS to provide the basis for the period of closure. As described in Appendix D, the closure period is based on rainfall data and soil moisture conditions associated with the critically dry water year type. Consistent with ENF LRMP Standard and Guideline for Management Practice 27, this will provide the minimum closure and allow for trails to be open at other times when conditions permit. The Forest Supervisor

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is, however, a proven solution to the problem in other OHV areas of the country. Reconsider this option.

### Commenter 637

- Response: Thank you for your comment. The experience on the ENF has been that to implement a wet weather closure that opens roads or trails for short periods during the normal wet season has required a significant amount of time and resources to assure that signs are changed to display which routes are open or closed, gates are in proper positions, phone messages, emails messages, and websites are current, etc. The Forest Supervisor has concluded that it is not reasonable to implement this strategy across the Forest, because of the staffing needed to implement signing, gate management, etc., and the ability to inform the diverse publics that use the Forest in a timely way.
- 15. Seasonal closure results in severely limiting access for non-motorized recreation forest-wide for fully half of the year, and most of the public is unaware how this will affect virtually all non-motorized activity on the forest.

# Commenter 1039

- Response: Thank you for your comment. The seasonal closure in Modified B is from January through March, not for a six-month period. In all of the action alternatives, surfaced roads are open to wheeled motor vehicle use during the seasonal closure; the closure only applies to native surface roads and trails. The Forest Supervisor may promulgate Forest Orders at other times of the year to close roads or trails due to wet weather conditions, when conditions warrant. The Implementation Strategy in Chapter 2 of the FEIS describes how the Forest will work with the public to provide education and information about the travel management direction, including the seasonal closures.
- 16. The seasonal closures as outlined in proposed alternatives B-E are overly restrictive to the public use of the trail system. The closures as outlined means that those of us with Red Sticker off road vehicles would be able to ride only from October 15 to November 1 and from April 20 to May 31. The proposed closure times are the best time to use these public trails. The seasonal trail closures will put more pressure on the limited and declining amount of other OHV areas, will result in more accidents and is merely a creative way to close trail systems. Seasonal trail closures will mean that more people will be using the OHV trail system in the summer, will result in more dust, more accidents because of limited visibility that the dust creates. A study done by Roger Poff concluded that more damage is done by the dust moving away from the trail bed during dry conditions than the compaction that happens when the soil is wet. Public land should be open for the public to enjoy.

### Commenter 156

- Response: Thank you for your comment. Seasonal closures on native surface routes are intended to avoid damage to roads and trails, as well as prevent rutting, soil erosion, and other resource damage. Certain OHVs that do not meet California emission standards are issued red sticker registrations by the California Department of Motor Vehicles. This registration limits the use of these vehicles in certain California OHV riding areas during certain seasons. The most recent schedule of Red Sticker riding areas lists areas on the ENF as having a year round season. The assertion that the seasonal closure will increase summer use and result in more route damage or more accidents is speculative at this time. Condition surveys will continue to be conducted, as described in the Implementation Strategy in Chapter 2 of the FEIS, and will be used to identify needed maintenance.
- 17. Any seasonal closure is unreasonable, unnecessary and outlandish. There are years where the months from January through April have been very wet years, but there are many years where only January is wet enough to have limited OHV use. Any closure other than the single

month of January certainly appears as discrimination because it eliminates use only of the OHV. Roads and trails should be managed like Rock Creek OHV where the Forest Supervisor opens and closes certain areas due to current and expected weather conditions.

### Commenter 167

Response: Thank you for your comment. Appendix D was added to the FEIS to provide the basis for the period of closure. As described in Appendix D, the closure period is based on rainfall data and soil moisture conditions associated with the critically dry water year type. The experience on the ENF has been that to implement a wet weather closure that opens roads or trails for short periods during the normal wet season has required a significant amount of time and resources to assure that signs are changed to display which routes are open or closed, gates are in proper positions, phone messages, emails messages, and websites are current, etc. The Forest Supervisor has concluded that it is not reasonable to implement this strategy across the Forest, because of the staffing needed to implement signing, gate management, etc., and the ability to inform the diverse publics that use the Forest in a timely way.

18. Closing the trails during the winter will not only increase impact during the summer; it also will limit a lot of use during the winter. Winter use can be fine as long as we respect tread lightly.

### Commenter 91

- **Response:** Thank you for your comment. Appendix D was added to the FEIS to provide the basis for the period of closure. As described in Appendix D, the closure period is based on rainfall data and soil moisture conditions associated with the critically dry water year type. When the travel tread and subgrade become saturated, damage to the road or trail is likely. The assertion that the seasonal closure will increase summer use and result in more route damage is speculative at this time. Condition surveys will continue to be conducted, as described in the Implementation Strategy in Chapter 2 of the FEIS, and will be used to identify needed maintenance.
- 19. The seasonal closure will terminate our use of the NF, since the warm dry months are not desirable due to dust and heat. Dust will increase accidents. This is overly restrictive. I believe that the trail system should be normally open with the current rule of 1 inch of rain in 24 hours = closed for 2 days; 2 inches of rain in 24 hours = closed 4 days.

### Commenter 177, 1067

- Response: Thank you for your comment. The ENF does not currently have wet weather closure direction as described by the commenter. There is specific wet weather closure direction that applies to the Rock Creek area which allows trails to be open following a 48 hour drying period. The Forest Supervisor has concluded that it is not reasonable to implement this strategy across the Forest, because of the staffing needed to implement signing, gate management, etc., and the ability to inform the diverse publics that use the Forest in a timely way. The seasonal closure included in Modified B allows for public wheeled motor vehicle use during a significant amount of time when weather conditions are not hot and dry. The seasonal closure also allows for use of surfaced roads during the winter period.
- 20. Loosing access to routes and private property during seasonal closure. The seasonal closure removes best OHV recreational opportunity during the best time of year for riding.

Commenter 1001, 1002, 1008

**Response:** Thank you for your comment. It is recognized that many riders enjoy riding in the Fall to early Spring period because of the cooler temperatures, lack of dust, and fewer visitors. The seasonal closure is needed to meet Forest Plan standards and guidelines that require a

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seasonal closure during wet weather periods on unsurfaced routes. Seasonal closures on such routes are intended to protect roads and trails from damage when the travel tread cannot support the vehicle use, as well as to prevent rutting, soil erosion, and other resource damage. Appendix D was added to the FEIS to provide the basis for the period of closure. As described in Appendix D, the closure period is based on rainfall data and soil moisture conditions associated with the critically dry water year type.

21. The closure dates of Nov 1 through April 30 are excessively restrictive and have a very uneven year-to-year correlation to moisture content of soils. It completely ignores the common pattern of a drying trend that the lower elevations enjoy most commonly in the months of January or February. Instead, should do a "call first" policy, just like burn days, to see if the roads are open.

# Commenter 1039

Response: Thank you for your comment. Appendix D was added to the FEIS to provide the basis for the period of closure. As described in Appendix D, the closure period is based on rainfall data and soil moisture conditions associated with the critically dry water year type. This is the timeframe when soil moisture is sufficiently high to warrant closures. The Forest Supervisor did consider using a wet weather closure protocol of opening routes for short time periods during the wet weather period, but has has concluded that it is not reasonable to implement this strategy across the Forest, because of the staffing needed to implement signing, gate management, etc., and the ability to inform the diverse publics that use the Forest in a timely way.

22. The ENF Standards and Guidelines clearly states: "A closure plan will be instituted for motorized use, during wet weather periods to reduce damage to native surface trails. The plan will allow for trails to be open when soil conditions permit." Also, the Chief's Appeal Decision from the previous OHV travel plan in summary states that wet weather closures should be site-specific rather than forest wide programmatic closures."

Commenter 64, 152, 385, 386, 720, 721, 741

Response: Thank you for your comment. The seasonal closure consistent with ENF LRMP Standard and Guideline for Management Practice 27, in that it will provide the minimum closure and allow for trails to be open at other times when conditions permit. The seasonal closures on native surface routes are intended to avoid damage to roads and trails, as well as to prevent rutting, soil erosion, and other resource damage. The Forest Supervisor may promulgate Forest Orders at other times of the year to close roads or trails due to wet weather conditions, when conditions warrant. The seasonal closure proposed in the alternatives for this project is project specific and the effects analysis is specific to the project. The seasonal closure describes the specific timeframes that it will be applied and the routes that it applies to. Appendix D was added to the FEIS to provide the basis for the period of closure. As described in Appendix D, the closure period is based on rainfall data and soil moisture conditions associated with the critically dry water year type.

23. To protect native surfaced roads they must be closed to wheeled vehicle use from November 1 to April 30 as in Alternative C. They could be opened in exceptionally dry years, but the starting point should be complete closure for the six-month period. Wheeled vehicles should not be allowed on snow-covered roads no matter what the depth of snow except for paved roads.

Commenter 1045, 1075

**Response:** Thank you for your comment. Alternative C proposes a seasonal closure from November 1 to April 30. Modified B proposes a seasonal closure from January 1 through

- March 31 and restricts wheeled motor vehicle use of native surface roads during the seasonal closure period, independent of whether there is snow on the routes.
- 24. Seasonal closure is not needed. Any area above 5000 feet would close itself with snow. Major areas below 5000 feet would be Elkins Flat and Gold Note, which could be regulated like Rock Creek.

Commenter 366, 704, 742, 1068

- Response: Thank you for your comment. The seasonal closure is needed to meet Forest Plan standards and guidelines that require a seasonal closure during wet weather periods on native surface routes. Seasonal closures on such routes are intended to avoid damage to roads and trails, as well as to prevent rutting, soil erosion, and other resource damage. As described in Appendix D of the FEIS, the higher elevation areas of the Forest do have snow covering the roads and trails for much of the winter season; however, there are many roads and trails in the lower elevations that are not covered by snow each year, or have snow cover only for short periods of time. The Forest Supervisor did consider using a wet weather closure protocol of opening routes for short time periods during the wet weather period, but has concluded that it is not reasonable to implement this strategy across the Forest, because of the staffing needed to implement signing, gate management, etc., and the ability to inform the diverse publics that use the Forest in a timely way.
- 25. Support the closure of native surface roads during the wet season in order to protect them from enhanced erosion. However, the period of prohibition should not be the minimum (Jan 1 to March 31) because of the challenges of extending it, but should be November through April.

Commenter 1072

- **Response:** Thank you for your comment. Alternative C proposes a seasonal closure from November 1 to April 30. Appendix D was added to the FEIS to provide the basis for the period of closure. As described in Appendix D, the closure period is based on rainfall data and soil moisture conditions associated with the critically dry water year type.
- 26. The seasonal closure extremely limits when Red Sticker users can ride and imposes a financial burden by requiring those with Red Sticker motorcycles to purchase green sticker motorcycles.

Commenter 729

- Response: Thank you for your comment. Seasonal closures on native surface routes are intended to avoid damage to roads and trails, as well as prevent rutting, soil erosion, and other resource damage. Certain OHVs that do not meet California emission standards are issued red sticker registrations by the California Department of Motor Vehicles. This registration limits the use of these vehicles in certain California OHV riding areas during certain seasons. The most recent schedule of Red Sticker riding areas lists areas on the ENF as having a year round season. The seasonal closure will apply to all public wheeled motor vehicle use on native surface roads and trails.
- 27. Implementing temporary closures based on actual conditions would work best. Commenter 680

Response: Thank you for your comment. The seasonal closure is needed to meet Forest Plan standards and guidelines that require a seasonal closure during wet weather periods on native surface routes. Seasonal closures on such routes are intended to avoid damage to roads and trails, as well as to prevent rutting, soil erosion, and other resource damage. Appendix D was added to the FEIS to provide the basis for the period of closure. As described in Appendix D, the closure period is based on rainfall data and soil moisture

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- conditions associated with the critically dry water year type. The Forest Supervisor did consider using a wet weather closure protocol of opening routes for short time periods during the wet weather period, but has concluded that it is not reasonable to implement this strategy across the Forest, because of the staffing needed to implement signing, gate management, etc., and the ability to inform the diverse publics that use the Forest in a timely way.
- 28. Seasonal closure should be based on conditions not date. DEIS presents no scientific data to back up the need for closures according to calendar dates. The fixed date closures would be hard to manage.
- Commenter 49, 53, 177, 231, 335, 383, 443, 644, 601, 673, 703, 741, 750, 751, 783, 786, 801, 891
- Response: Thank you for your comment. Appendix D was added to the FEIS to provide the basis for the period of closure. As described in Appendix D, the closure period is based on rainfall data and soil moisture conditions associated with the critically dry water year type. The Implementation Strategy in Chapter 2 of the FEIS describes how the Forest will work with the public to information and educate visitors about the travel management direction, including the seasonal closure.
- 29. The R5 Route Designation Guidebook and the Sierra Nevada Forest Guidelines suggest seasonal closures but do not mandate them. Please remove this restriction and note that the Forest Supervisor can enact closures as necessary to protect resources.

# Commenter 378

- Response: Thank you for your comment. The seasonal closure is needed to meet Forest Plan standards and guidelines that require a seasonal closure during wet weather periods on native surface routes. Appendix D was added to the FEIS to provide the basis for the period of closure. As described in Appendix D, the closure period is based on rainfall data and soil moisture conditions associated with the critically dry water year type. The Forest Supervisor did consider using a wet weather closure protocol of opening routes for short time periods during the wet weather period, but has concluded that it is not reasonable to implement this strategy across the Forest, because of the staffing needed to implement signing, gate management, etc., and the ability to inform the diverse publics that use the Forest in a timely way.
- 30. FS can use gates to control & limit travel during the wet season; should take in consideration cabin owners and their access to cabins

# Commenter 439, 862

- **Response:** Thank you for your comment. The Forest has used gates on some road to manage public wheeled motor vehicle use on the Forest in the past, including seasonal use of roads, and will continue to use gates on certain roads. Some gates on the Forest are installed by others, through prior authorization, such as special use permit holders, holders of private inholdings, etc. The Forest will continue to work with permit holders, including recreation residence permit holders in regard to authorized uses and activities.
- 31. All Alternatives except A, would prohibit trail and ML-2 travel during parts of the hunting and fishing seasons

# Commenter 884

**Response:** Thank you for your comment. The seasonal closure period would prohibit public wheeled motor vehicle use of native surface roads and trails during the closure period, but would not prohibit all public use of these routes. This effect has been added to the environmental effects analysis in the Recreation section in Chapter 3 of the FEIS.

32. The direction for implementing the seasonal closure is unclear and it appears its implementation will be decided by an unknown person or decision maker. We would like to have the OHV users have a voice in how it is implemented

Commenter 729, 893

Response: Thank you for your comment. The seasonal closure period will be implemented through the Motor Vehicle Use Map, signing, gate management, and a variety of public information efforts. The Implementation Strategy in Chapter 2 or the FEIS describes how the Forest will work with the public to educate and inform visitors about the travel management restrictions, including the seasonal closures. The Forest Supervisor may promulgate Forest Orders at other times of the year to close roads or trails due to wet weather conditions, when conditions warrant.

33. Alt C best protects the system and resources based on the weather patterns in our region.

Commenter 361, 362

**Response:** Thank you for your comment.

34. Communicate with the public about the beginning and end of the seasonal closure with clear procedures like using the internet;

Commenter 382

**Response:** Thank you for your suggestion. The Implementation Strategy in Chapter 2 or the FEIS describes how the Forest will work with the public to educate and inform visitors about the travel management restrictions, including the seasonal closures.

35. Do not agree with winter time closures; motorized travel should not be restricted during any of the four seasons- do not close during winter; reconsider the winter time suggestion/closure as you are impacting positive activities that families enjoy together

Commenter 74, 91, 92, 131, 136, 146, 192, 242, 282, 317, 366, 379, 398, 442, 886, 919

Response: Thank you for your comment. It is recognized that many riders enjoy riding in the Fall to early Spring period because of the cooler temperatures, lack of dust, and fewer visitors. The seasonal closure is needed to meet Forest Plan standards and guidelines that require a seasonal closure during wet weather periods on unsurfaced routes. Seasonal closures on such routes are intended to protect roads and trails from damage when the travel tread cannot support the vehicle use, as well as to prevent rutting, soil erosion, and other resource damage. Appendix D was added to the FEIS to provide the basis for the period of closure. As described in Appendix D, the closure period is based on rainfall data and soil moisture conditions associated with the critically dry water year type.

36. The proposed massive cut backs in available trails, roads, and general land for OHV use is short sighted and badly thought out. Slicing out huge portions of the OHV system is simply not in the public interest. I for one understand that budgets and other concerns must be taken into account but the proposed cuts go too far. Start with removing the proposed seasonal closures and work from there.

### Commenter 51

**Response:** The seasonal closure is needed to meet Forest Plan standards and guidelines that require a seasonal closure during wet weather periods on unsurfaced routes. Seasonal closures on such routes are intended to protect roads and trails from damage when the travel tread cannot support the vehicle use, as well as to prevent rutting, soil erosion, and other resource damage.

37. Let me specifically support Alt E if you make a couple of strengthening changes: Incorporate Alt C Seasonal closures of November 1 - Apr 3 and the over-the-snow requirement of having

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so it is not necessary to propose a shorter closure that, during most years, fails to protect soils from wet weather use.

### Commenter 389

Response: Thank you for your comment. Appendix D was added to the FEIS to provide the basis for the period of closure. As described in Appendix D, the closure period is based on rainfall data and soil moisture conditions associated with the critically dry water year type. The seasonal closure period proposed in Alternatives B, Modified B, and E is considered to provide an appropriate level of protection of roads and trails from damage due to public wheeled motor vehicle use during wet conditions. The Forest Supervisor may promulgate Forest Orders at other times of the year to close roads or trails due to wet weather conditions, when conditions warrant. The Forest Supervisor feels that this approach allows for the clearest notification to the public and maintains the burden on the Forest to manage the roads and trails.

42. Suggests adding a November 1 to March 1 closure to Alternative A for unsurfaced routes. No seasonal closure for access to private property.

# Commenter 153

- **Response:** Thank you for your comment. Alternative A is the No Action Alternative, and so reflects the existing management direction on the Forest. Access to private land will be provided for, consistent with federal regulations (36 CFR 212.6(b)).
- 43. Prefers the wet seasonal closure from Alternative C (but designate routes from Alt. E). Street-legal vehicles should not be exempt from the 12 inch minimum snow requirement. All native surfaced roads and trails should be closed to all OHV use from November 1 to April 30.

Commenter 254, 389, 417, 1024, 1034, 1037, 1045, 1056, 1062

**Response:** Thank you for your comments.

44. Although we do not favor Alternative C, we do believe the seasonal closure and over-the-snow motorized wheeled traffic proposed in Alternative C provides the best protection for resources and the flexibility to allow for extended season use when weather conditions are such that vehicle use will not result in soil damage.

### Commenter 389

- Response: Thank you for your comment. Appendix D was added to the FEIS to provide the basis for the period of closure. As described in Appendix D, the closure period is based on rainfall data and soil moisture conditions associated with the critically dry water year type. The seasonal closure period proposed in Alternatives B, Modified B, and E is considered to provide an appropriate level of protection of roads and trails from damage due to public wheeled motor vehicle use during wet conditions. The Forest Supervisor may promulgate Forest Orders at other times of the year to close roads or trails due to wet weather conditions, when conditions warrant. The Forest Supervisor feels that this approach allows for the clearest notification to the public and maintains the burden on the Forest to manage the roads and trails.
- 45. By adopting strict seasonal closures and over-there-snow requirements of Alt C, we can protect trails and native surface roads from 11/1 thru 4/30.

Commenter 216, 243, 247, 250

**Response:** Thank you for your comment. Appendix D was added to the FEIS to provide the basis for the period of closure. As described in Appendix D, the closure period is based on rainfall data and soil moisture conditions associated with the critically dry water year type. The seasonal closure period proposed in Alternatives B, Modified B, and E is considered to

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provide an appropriate level of protection of roads and trails from damage due to public wheeled motor vehicle use during wet conditions. The Forest Supervisor may promulgate Forest Orders at other times of the year to close roads or trails due to wet weather conditions, when conditions warrant. The Forest Supervisor feels that this approach allows for the clearest notification to the public and maintains the burden on the Forest to manage the roads and trails.

46. The documents and presentations state that there are no seasonal closures but we have a seasonal closure at Barrett Jeep Trail.

Commenter 1006

**Response:** Thank you for your comment. We agree that Barrett Lake Jeep Trail does close during periods of wet weather, as do the trails in the Rock Creek area. In the FEIS, we are referring to a Forest-wide seasonal closure, as opposed to specific trails or areas.

# Sierra Pacific Industries

1. SPI is a co-operator with the FS in the use and maintenance of several hundred miles of shared road system and NFS roads and watercourse crossings that are utilized to access projects on SPI lands, not only during the life of the project, but also for several years afterward. SPI is responsible for maintaining all drainage structures on roads or skid trails, conditions from sedimentation, etc. SPI believes that the protection of public trust resources such as water quality, wildlife, and heritage resources takes precedence over any recreational use of the forest. It is an unfortunate reality that motor vehicle access greatly augments the illicit us of our properties, including dumping of refuse and stolen vehicles, theft, vandalism, and drug-related activity. It also creates a substantially increased risk of wildfire ignition. No prescriptive right exists on SPI property for any use or ingress by motor vehicle recreationists [in 1997, SPI filed a Notice of Consent with the County which severely limits the ability to establish a prescriptive right on its lands, any individual asserting such a right would have to either be an adjacent property owner with access needs, or have a valid mineral claim.

Commenter 387

Response: Thank you for your comment. The Forest Service acknowledges that many people do access SPI property from National Forest System routes. The illicit uses noted in the comment have been observed to various degrees on Sierra Pacific Industries property adjacent to National Forest System lands or where there is a government right of way. The Forest Service has tried not to show routes on private lands, where the Forest Service does not have a right of way, so as to discourage trespass.

2. SPI has a direct economic interest in the condition of shared NF System roads subject to the FS's decision. Winter closure period proposed in Alts B-E is of paramount importance to usalthough the implication is clear, the winter closure period does not explicitly state which of the alternative closure periods would best protect the resource- a review of weather data from RAWS stations my be instructive- prefers the closure period from 11/1-4/30 but if SPI had to make a choice it would seem better to allow travel in November more than in April.

Commenter 387

Response: Thank you for your comment.

3. Ch. 3 "Facilities" description of the Affected Environment Portion of the DEIS lacks in the description of financing- ignores the very substantial contribution of the sharing of road construction and reconstruction costs by SPI and cooperation predecessor companies- also missing is the maintenance costs on shared NFS roads are likewise partially the responsibility of SPI.

# Commenter 387

**Response:** Thank you for your comment. We have included an estimate of the value of that work performed by SPI in the FEIS.

4. SPI is concerned that limiting the use of primitive camps sites on NF lands will increase the pressure for camping on adjacent private lands. direct effects of OHVs on SPI property adjacent to FS controlled roads: marked degradation of several meadows and wet areas, damage to meadow systems has consisted of direct physical destruction of vegetation and wildlife habitat, as well as the alteration of drainage patterns that affect the water table and sustainability of these wetland ecosystems; the creation of tracks and roadways through many newly planted areas and older plantations, result in hillslope erosion and the destruction of trees; creation of unimproved watercourse crossings, and user-made roads that lead to compacted and degraded near-stream environments and streambank structures, siltation directly into watercourses, perennial problem areas; the destruction of road systems due to road rutting and the breakdown of erosion control structures, some created around gates and barricades

# Commenter 387

- **Response:** In Chapter 3 of the FEIS under law enforcement, it is recognized that vandalism, theft, littering and resource damage continue to occur on private land and National Forest System lands within the boundary of the Eldorado National Forest. The implementation strategy has been developed to improve the implementation of the designated route system. A motor vehicle use map would be developed and provided to the public to show which routes are open to public use by type of vehicle per route and season open for use. This motor vehicle use map may be revised in future decisions as needed to meet changing conditions or management strategies.
- The Forest Service will also produce a subsequent local travel map following the production of the motor vehicle use map that indicates which routes area designated open to the public by the type of vehicle per route and season open to use, and identifies other important features on the Forest that will help the public navigate the system. This map should be similar to the Forest recreation map.
- The Forest Service would provide a brochure in conjunction with the motor vehicle use map with a clear and simple explanation of the rules and restrictions and examples of signs on the ground.
- The Forest Service would provide clear, consistent and adequate signage that identifies routes designated as open by type of vehicle per route and season open for use corresponding to the motor vehicle use map and the local travel map.
- The Forest Service would begin working with a collaborative group of public stakeholders to develop a public education strategy that includes public meetings, workshops, and other public forums to educate forest users about the designated route system, to assist the public in reading the motor vehicle use map and the travel map, educate the public about the potentially negative effects of their activities and to discuss how the public can help with the implementation of the designated route system by volunteering for maintenance activities, enforcement of the rules and education of other forest users.
- These implementation strategies would assist the public in identifying and staying on the designated routes. Once the majority of the public knows where they can go on National Forest System lands, they will also respect private property and not trespass.
- 5. Alternatives B and C provide for vehicle access across several road networks on SPI owned areas including McManus area (11N70 and 11N63), Hell's Delight (10N34 and 10N28), and

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Upper Alder Creek Basin (11N46 and 10N62). We have had problems with water quality issues in two of these three basins as a result of wet weather recreation. Since the Alder Creek and Hells Delight areas are densely roaded, and there is no practical way to gate or restrict traffic, we strongly encourage the implementation of the November 1 to April 30 closure dates attached to Alternative C. While the McManus area is gated seasonally at White Meadows Road, we have found winter use of the area is prolific, resulting in water quality problems on several roads in the area. Alternative D is much more restrictive in the number of roads open in these areas. This may in part offset its less desirable closure period of December 1 to April 30. Alternative E, with the most restrictive access to these areas, still features the closure from January 1 to March 31. This closure period is inadequate to protect the road and watershed resources, regardless of the extent of roads open or closed.

Commenter 387

Response: Thank you for your comment.

6. For Road 14N06, SPI would encourage the elimination of the segment beyond the gate onto Bunker Hill as in currently mapped in Alts C and E. For Road 14N05, SPI strongly endorse the no traffic beyond the trailhead 15N02 as shown in Alternatives B-E. OHVs have driven around barriers, destroyed road drainages, and created alternative routes causing major environmental damage to the SPI system roads and to stream courses in section 29, T14N, R15E.

Commenter 387

**Response:** Thank you for your comment.

7. Roads 14N58 and 14N58A, SPI endorses the limitation of vehicle traffic in these areas, best expressed by Alternative D and E. Road 12N58 – SPI routinely have problems with trespass from this access point, and encourage you to eliminate the northern most 1/4 mile or so of that road. A loop is still available from this point. For Road 12N57, SPI would like to discourage entry onto their lands at that point.

Commenter 387

Response: Thank you for your comment.

8. Road 10N91 ties to 10N91A and 10N91B under Alternative B. There is a locked gate at the property line between SPI and National Forest System land that has been in place since before SPI acquired the land in 1997. Roads 10N91 A and B do not show in Alternative C or D.

Commenter 387

- **Response:** The Forest Service has an easement dated January 19, 1978 for the premises over and across lands in the E1/2 NW1/4 section 33, T10N, R16E, M.D.B.&M for the Mahons Hook Road, 10N91. The locked gate may interfere with the rights and privileges of the easement.
- In Alternative C. Roads 10N91A and 10N91B were purposely not shown as open to the public. This Alternative focuses on balancing maximum public wheeled motor vehicle access with implementation of the ENF LRMP. This alternative minimally directs OHV use on routes where there is available mileage and connections to other routes designated for OHV use.
- In Alternative D, the 10N91A and 10N91B Roads were not shown as open to the public. The alternative was designed to take into account past patterns of OHV use on the Forest as well as other public motor vehicle use. It allows for a higher density of roads and trails available for public wheeled OHV and highway-licensed motor vehicle use in popular areas used in the past. Outside of these areas, the alternative focuses on providing general motorized access

with lower route density. It is for this reason why the two roads were not included in the routes open to public wheeled motor vehicle use.

Road 10N02 is listed in Alternatives B, C and D as open to street legal vehicles only. Only Alternative E is 10N02 listed as "Not open for public motor vehicle use".

9. The Eldorado recently obtained the right to traverse Road 10N02 under a co-op road agreement with SPI. The road has historically been gated at Happy Valley Road, and currently remains so. Approximately 1,000 acres of SPI land lies behind the gate. There are significant concerns regarding public access to this area, including highly erosive granitic soils and the presence of several significant archaeological sites. The fire danger in this vicinity is typically very high. In the past decade at least \$100,000 has be spend on the first mile of Road 10N02 alone to reduce surface erosion to insignificant levels. Spur roads off 10N02, exclusively on SPI land, are likewise subject to severe erosion.

Commenter 387

**Response:** Thank you for your comment.

10. The road designated as E-60 on the Alternative maps is no longer a county road, but was quitclaimed to Michigan-California Lumber Company after the closure of the Pino Grande sawmill. SPI and the Forest Service share easements on the portion of the road shown on the maps. To our knowledge, the road is now known as 12N60.1. This is a limited easement to the Forest Service; that is, the easement document states that"...such extension of rights and privileges shall not include use by the public except for use as a trail." There is a locked gate near the intersection of 12N60 with Sand Mountain Boulevard, Road 12N64.

Commenter 387

Response: The Forest Service agrees that the road shown as ELD-60 on the Alternative maps is not a county road and that the Forest Service has an easement dated 20<sup>th</sup> of August, 1992. The road is shown on some maps as 12N60.1. Currently, the Forest Service refers to this road as 12N60 (Debbie Parlin will check with El Dorado County on the status of this segment of the Mosquito Road). The Forest Service agrees that the easement document states, "Provided further, that such extension of rights and privileges shall not include use by the public except as use as a trail".

# Site Specific Analysis

1. It does not appear that significant site specific analysis was used in developing the alternatives.

Commenter 360, 637

Response: Thank you for your comment. An extensive amount of site specific information was used in developing the alternatives, including information collected from FS staff and the public. Public meetings and field trips were held during summer 2006 in which many individuals and groups identified specific routes and areas that they use for a variety of recreation purposes and this information was used in the development of the alternatives. Additionally, information regarding specific resource concerns and areas with concerns was provided by groups and individuals, which was also used in the development of the alternatives. Alternative B was modified based in part on comments received from the public upon release of the DEIS, about specific routes or recreation activities that they engage in or resource concerns.

# Socio-Economic

1. Not one of the options has attached an economic impact study. What is the cost to implement

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each plan, and what is the economic impact to the surrounding businesses?

Commenter 87, 199, 1001, 1047

Response: Thank you for your comment. The Socioeconomic section in Chapter 3 of the FEIS has been revised to better describe the economic impact to the local economy of implementing the various alternatives. Revenue generated from recreation visits to the ENF may be significant for individual businesses but is only a small percentage of the overall local economy. Predictions about changes in recreational use that may occur on the Forest based upon which alternative is selected would be highly speculative. The FS believes that under all action alternative, levels of use would be relatively static although use patterns may change.

2. If you wish to lose local revenue, cut the trails and the roads back, limit where myself and others can go and I personally will go somewhere else and spend my money somewhere else! I think if you look at how much money is spent weekly in Placerville, Cameron Park, Pollock Pines, and Camino, you'll see that the better alternatives than cutting back roads and trails.

Commenter 57

**Response:** Thank you for your comment.

3. Road closures affect local businesses, DEIS does not address this

Commenter 312, 313, 420, 649

Response: Thank you for your comment. The Socioeconomic section in Chapter 3 of the FEIS has been revised to better describe the economic impact to the local economy of implementing the various alternatives. Revenue generated from recreation visits to the ENF may be significant for individual businesses but is only a small percentage of the overall local economy. Predictions about changes in recreational use that may occur on the Forest based upon which alternative is selected would be highly speculative. The FS believes that under all action alternative, levels of use would be relatively static although use patterns may change.

4. This sport [4x4] brings lots of revenue to local businesses and surrounding areas; [the Rubicon] brings a lot of small business money to local towns up here

Commenter 291, 294

**Response:** Thank you for your comment. This Travel Management project does not make any decisions regarding use of the County administered Rubicon Trail. The Socioeconomic section in Chapter 3 of the FEIS has been revised to better describe the economic impact to the local economy of implementing the various alternatives in this project. Predictions about changes in recreational use that may occur on the Forest based upon which alternative is selected would be highly speculative. The FS believes that under all action alternative, levels of use would be relatively static although use patterns may change.

5. DEIS Chapter 3, pages 301 & 302- no effect on motorized use in ENF- should be deleted. The potential effects not listed.

Commenter 439, 631, 708, 767

Response: Thank you for your comment. The Socioeconomic section in Chapter 3 of the FEIS has been revised to better describe the economic impact to the local economy of implementing the various alternatives in this project. This section includes references to specific relevant studies that have been completed in regards to recreation visitors and spending patterns. Predictions about changes in recreational use that may occur on the Forest based upon which alternative is selected would be highly speculative. The FS believes that under all action alternative, levels of use would be relatively static although use patterns may change. This Travel Management project does not make any decisions regarding use of the County

administered Rubicon Trail. It is speculative to estimate changes in costs to counties related to law enforcement, since it is unknown how use patterns will change.

6. The DEIS says that towns located near popular NF OHV and recreation areas are big winners- how do we propose to make up for lost revenue? What kind of studies have been done for these numbers? Will there be County costs for enforcement on road closures? How will the closures affect the transient occupancy tax?

Commenter 380, 879

Response: Thank you for your comment. The Socioeconomic section in Chapter 3 of the FEIS has been revised to better describe the economic impact to the local economy of implementing the various alternatives in this project. This section includes references to specific relevant studies that have been completed in regards to recreation visitors and spending patterns. Predictions about changes in recreational use that may occur on the Forest based upon which alternative is selected would be highly speculative, as would effects on the transient occupancy tax that is levied on visitors occupying lodging. The FS believes that under all action alternative, levels of use would be relatively static although use patterns may change. It is speculative to estimate changes in costs to counties related to law enforcement, since it is unknown how use patterns will change.

7. In California quiet recreation contributes \$46 billion annually to California's economy. It supports 408,000 jobs across California; generates \$3.1 billion in annual state tax revenue; and produces \$28.1 billion annually in retail sales and services across California. The OHV lobby will argue they spend more money in the state, but that must be weighed against the enormous cost in terms of natural resource damage, impacts to private property, displacement of other recreation, law enforcement requirements and the expense of road and trail maintenance, as well as the effects of not doing such maintenance

#### Commenter 389

Response: Thank you for your comment. The Socioeconomic section in Chapter 3 of the FEIS has been revised to better describe the economic impact to the local economy of implementing the various alternatives in this project. Predictions about changes in recreational use that may occur on the Forest based upon which alternative is selected would be highly speculative. The FS believes that under all action alternative, levels of use would be relatively static although use patterns may change. Some of the other effects identified in this comment are addressed in other sections in Chapter 3 of the FEIS, such as the Facilities Recreation and Adjacent Land Ownership sections.

8. Quiet recreation creates \$48 billion annually to CA economy. Support this income by protecting and preserving the forest environment that nurtures that income

Commenter 1031

**Response:** Thank you for your comment.

9. The DEIS does not define how the proposed changes would be funded.

Commenter 64, 436, 437, 681, 737, 1028, 1046, 1108, 1109

Response: Thank you for your comment. The Implementation Strategy in Chapter 2 of the FEIS describes various efforts that will be undertaken to implement the travel management direction. Funding for this implementation will come from a variety of sources, including Federal funding, grants and cooperative agreements, partnerships, coordination with other ongoing Forest projects, volunteers and volunteer labor. These sources of funds have been used in the past to provide for and manage public wheeled motor vehicle use on the Forest. As is the case in most projects undertaken by the Forest, implementation will be completed to the extent that funds and resources are available.

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10. Sport brings lots of revenue to local businesses, brings local businesses to area Commenter 291, 294

Response: Thank you for your comment.

11. Do not designate more routes than the Forest has the staff and funding to monitor, manage, restore, and enforce.

Commenter 1117

**Response:** Thank you for your comment. Funding for this implementation will come from a variety of sources, including Federal funding, grants and cooperative agreements, partnerships, coordination with other ongoing Forest projects, volunteers and volunteer labor. These sources of funds have been used in the past to provide for and manage public wheeled motor vehicle use on the Forest. As is the case in most projects undertaken by the Forest, implementation will be completed to the extent that funds and resources are available.

# Spur Roads/ Dead Ends/ Turn outs

1. Request that bypasses and turnouts on ENF trails be kept open Commenter 208, 565, 785

**Response:** One of the purposes of the national Travel Management regulations and this travel management project is to identify the specific roads and trails where wheeled motor vehicle use will be allowed and to prohibit cross country travel. Turnouts along roads or trails are considered to be a part of the road or trail, and that use would be allowed on routes that are designated for motor vehicle use. Specific bypass routes were considered in the development of the different alternatives. The Implementation Strategy describes a process to identify bypasses in the future to be added to the designated route system.

2. FS should not close a dead end or "spur" road just because it does not lead anywhere, it may lead to an old mine or quarry, stream, vista, picnic area, or camping and should be considered a reason to keep it open

Commenter 61, 208, 231, 339, 358, 379, 383, 413, 531, 786, 801, 885, 891, 973, 1013, 1028, 1046, 1047

**Response:** Alternative B was modified to address this and similar comments by allowing public wheeled motor vehicle use on many dead end and spur roads.

3. Final plan should close unauthorized routes that are 'roads to nowhere', dead end routes.

Commenter 635

**Response:** Thank you for your comment. The development of the alternatives included adding 20 to 47 miles of unauthorized routes to the system that were considered important to the alternative. Chapter 3 of the FEIS analyzes the effects of adding these routes to the system. Alternative C proposes to add to the system the least amount of unauthorized routes.

4. Keep open all the Rubicon and all of its spurs; all marked and unmarked spurs Commenter 74, 379, 455, 755, 886

Response: This Travel Management project makes no decisions regarding State or County roads or highways, including the Rubicon 4WD Trail, which is a county unmaintained road. El Dorado County is currently completing the Rubicon Trail Master Plan, which will provide direction for the use and management for the Rubicon Trail. The Forest has addressed some of the roads and trails providing access to the Rubicon Trail in this travel management project, and will work with the County in regards to specific bypasses along the trail, following completion of the Rubicon Trail Master Plan.

5. Be careful to not unfairly restrict access for non-motorized recreation - especially in things as parking and dead-end spurs.

Commenter 1039

Response: Thank you for your comment. The effects to both motorized and non-motorized recreation visitors from implementation of the different alternatives are described in the Recreation Section in Chapter 3 of the FEIS. The need for parking by motor vehicles for individuals to participate in various recreation activities is recognized. The parking direction included in this project follows the proposed national parking direction.

6. DEIS p.10 cites expectation of route proliferation from dead-end routes. Since route proliferation can occur at any point along routes and since there is no proof that route proliferation is specific to dead-ends, this assertion should be removed from the document and all dead end and spur routes must be added back to the inventory of the preferred alternative.

Commenter 531, 601

Response: Thank you for your comment. Chapter 1 of the FEIS presents the issues that were raised by the public during the initial scoping period and which were carried forward in the development of the alternatives. Past experience on the forest, along with a review of the inventory completed for this project, show that many unauthorized routes have been created at the end of short spur roads. We concur with the commenter that unauthorized routes can be created at any point along a route, and the inventory shows that many unauthorized routes occur along roads at points other than at the end of the road. All of the alternatives include dead-end roads and trails. In designing a transportation system, we have focused on including loops and connector routes of some length. Alternative B was modified to maximize the dead-end and spur routes to allow for easy access to general areas and dispersed camping.

7. Disagree with DEIS contention that dead-end routes promote route proliferation. Main source of route proliferation is logging skid trails that have not been properly restored to native state.

Commenter 531

**Response:** Past experience on the forest, along with a review of the inventory completed for this project, show that many unauthorized routes have been created at the end of short spur roads. All of the alternatives include dead-end roads and trails. In designing a transportation system, we have focused on including loops and connector routes of some length. Alternative B was modified to maximize the dead-end and spur routes to allow for easy access to general areas and dispersed camping.

8. What about the short spurs, parking areas, log landings, etc that serve as dispersed recreation areas? These should be analyzed at a smaller scale (100 sq mi).

Commenter 1041

**Response:** Thank you for your comment. All of the alternatives include dead-end roads and trails. In designing a transportation system, we have focused on including loops and connector routes of some length. Alternative B was modified to maximize the dead-end and spur routes to allow for easy access to general areas and dispersed camping.

9. Create loops and thru routes- a section should be added to the DEIS document that supports these additional loops and routes as referred to in the NOI in 3.3

Commenter 378

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- **Response:** Thank you for your comment. In designing a transportation system, we have focused on including loops and connector routes of some length. Opportunities for loops and through-routes are described in the Recreation section in Chapter 3 of the FEIS.
- 10. We have explored and plan on returning to 11N28 and back down the mountain along 11N37. The short spurs, many of which have already been cut off, should remain open for short time access and possible dispersed camping.

Commenter 226

**Response:** Thank you for your comment. All of the alternatives include dead-end roads and trails. In designing a transportation system, we have focused on including loops and connector routes of some length. Alternative B was modified to maximize the dead-end and spur routes to allow for easy access to general areas and dispersed camping.

# Wildlife

1. The protection and restoration of wildlife and wildlife habitat is of greater long-term importance, and should be a higher priority for the Forest Service, than providing the excessive access demanded by some off-road organizations; It is time for the Forest Service to begin to say "no" to the OHV crowd. It is high time the Forest Service took seriously their mandate to provide quality wildlife habitat for a public trust resource that belongs to the people of California.

Commenter 389, 861

- **Response:** We appreciate your opinion on this subject and agree that travel management on the Eldorado National Forest must ensure the continued existence of quality habitat for the diversity of wildlife species occupying National Forest lands.
- 2. The DEIS does a thorough job of documenting the direct, indirect and cumulative negative impacts of OHVs on cattle allotments, particularly meadow habitat. It also documents that meadow damage could result in the allotment being closed. The DEIS must also, however, look at the cumulative impacts to wildlife from the combined damage to meadows by cows and OHVs.

Commenter 389

- Response: Chapter three of the EIS, Terrestrial Wildlife, describes the cumulative effects motorized use combined with the effects of livestock grazing upon meadow associated species such as deer and the willow flycatcher. The EIS describes that historic livestock grazing has severely impacted some meadows and has been considered to be a primary factor that has influenced the suitability of willow flycatcher habitat and meadow habitat for birds in general. Since 2004, however, livestock grazing has been occurring under the more stringent guidelines applied in the Sierra Nevada Forest Plan Amendment. In addition, a stable or upward trend has been documented for all except one of the grazed meadows being monitored on the Eldorado National Forest.
- 3. Routes should not be designated in CSO or goshawk activity centers; these species would benefit from the effort to maintain and develop old forest emphasis areas.

Commenter 389

Response: We appreciate your opinion on this subject. Chapter three of the EIS describes the degree of road and trail influence within California spotted owl and goshawk Protected Activity Centers under the Alternatives. Modified Alternative B results in roads and trails influencing an estimated 18 percent of spotted owl PAC habitat (assuming a 60 meter zone of influence). With a few exceptions, identified in the Chapter 3, Terrestrial Wildlife Section of the EIS, these routes are system roads and trails. Modified Alternative B and Alternative E

avoided designating new routes (ML1 or unauthorized routes) in PACs except where such routes occurred along the very edge of the PAC or in cases where routes were determined to be an essential element of the transportation system.

4. At risk are critical wildlife and fish habitat, as well as economic impacts, from lack of access to Forest Fires.

#### Commenter 824

Response: It is difficult to meaningfully estimate how or whether the Alternatives might change the risk of losing important wildlife habitats to wildfires. Fires often start near transportation routes, and increased public access could result in a corresponding increase in the area with elevated risk for fire starts. On the other hand, as pointed out in this comment, reduced roaded access could hamper fire suppression opportunities when fires are burning in areas without road access. How these opposing risk factors might play out in future wildfire scenarios would be speculative due to the unpredictable nature of wildfires and the many variables involved.

Roadless areas and areas proposed for dedicated wilderness prevent habitat fragmentation.
 Habitat fragmentation is a major threat to species reduction. Consider how adding new motorized routes contributes to the problem of fragmenting habitat for wildlife.

Commenter 337, 421, 873, 860

**Response:** Additional information on fragmentation of old forest habitat patches has been added to the Old Forest Species and Habitat section in the Terrestrial Wildlife section of Chapter 3 in the FEIS.

6. DEIS insufficiently advances endangered species issues as a basis for restrictions. FS eliminated use with no site-specific analysis or technical support on the proximity of routes to goshawk or spotted owl habitat or nest sites.

### Commenter 360

Response: Site-specific results from analysis of the proximity of routes to known spotted owl and goshawk habitat and nest sites are shown in several of the tables in the Terrestrial Wildlife Environmental Consequences Section. Technical support regarding disturbance distances for spotted owls and goshawk were cited in the DEIS, and, in response to this comment, further literature was reviewed including a very in-depth assessment developed by the U.S. Fish and Wildlife Service for "Estimating the Effects of Auditory and Visual Disturbance to Northern Spotted Owls and Marbled Murrelets in Northwestern California". As shown in Appendix H, a combination of resource and public use issues were evaluated in determining which routes to propose for designation in each alternative. None of the alternatives used the proximity of spotted owl or goshawk nests sites as a factor in determining whether to designate existing system routes open for public use (ML2 routes and system trails). Modified B and Alternative E addressed proposals for new roads or trails (ML1 roads and unauthorized routes) by generally not opening these routes when they occurred within spotted owl PACs or within 0.25 miles of an activity center. Exceptions were made for several routes of particular importance to the transportation system and for routes which occurred within the edges of PACs (see Chapter 3, Terrestrial Wildlife, Environmental Consequences). Other Alternatives did not apply this intent. As shown in the Terrestrial Wildlife analysis, each of the Alternatives results in routes that are open within spotted owl and goshawk Protected Activity Center habitat, and in proximity of nest sites.

 Address lack of site-specific documentation supporting seasonal closures in critical winter range. Eliminate any seasonal closures not supported with clear evidence of a significant impact to deer by OHVs.

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# Commenter 386

- **Response:** None of the Alternatives proposes to implement seasonal closures in critical winter range as a means of reducing impacts to deer. The alternatives do propose seasonal closures to address the impacts of wet weather upon road and trail condition, soil erosion, and hydrologic resources.
- 8. Page xxv Terrestrial Wildlife Species and Habitat says "Alternative A will have the greatest impact upon terrestrial wild species due to habitat modification, behavioral changes, and potential for direct mortality associated with public wheeled motorized vehicle access and use." This statement is a personal value judgment and unduly prejudice's the decision maker. Please provide the site-specific evidence to support the above statement.

### Commenter 386

- **Response:** The citation is from taken from the Executive Summary comparing key resource areas. Chapter 3 of the EIS, Terrestrial Wildlife Section, describes the site-specific analysis conducted and the specific information upon which this summary statement is based.
- 9. The DEIS makes the statement that, "The ENF provides habitat for 320 species of birds, mammals, amphibians, and reptiles." The 1976 Land Management Plan identified 365 species, including the Pacific fisher; apparently, despite countless assertions that a particular project "may affect individuals but is not likely to result in a trend toward federal listing," forty-five species have been extirpated from the forest in the past 30 years. Clearly, the standards for determining harm are not sufficient to protect wildlife species from the cumulative effects of a variety of projects on the forest over decades.

# Commenter 419

- Response: Estimates of the number of wildlife species occurring on the Eldorado National Forest vary, particularly in relation to assumptions made about "counting" more transient occurrences of a number of migratory bird species. The list of species in the 1989 ENF Land and Resource Management Plan included mammals, birds, amphibians and reptiles, but not fish. Since the referenced 1976 Plan does not include an actual list of the species counted, exact reasons for the differing estimates cannot be determined. Estimates of species occurrence are based upon a changing body of literature and knowledge regarding species distributions; a difference in these estimates does not provide evidence that species were extirpated between 1976 and 1989.
- 10. Standards and Guidelines in the ENF LRMP (as amended by the SNFPA) require that projects "minimize old forest habitat fragmentation" and "assess the potential impacts of projects on the connectivity of habitat for old forest associated species." As stated above, merely attempting to assess the potential impacts may or may not meet the legal bar for NEPA compliance, but it does not meet the higher standard of protection required under the Executive Orders and Travel Management Rule. These require that the project give deference to the needs of wildlife over the desires of motorized recreationists; under every alternative, a moderate to high percent of deer critical winter range habitats on NFS lands are potentially influenced by motorized routes; Eliminating motorized routes in meadows, as prescribed in Alternative E, will greatly benefit fawning habitat, as well as a number of other meadow-dependent species; Cumulative effects analysis must include the effect of the proposed seasonal closure that excludes the Rock Creek area. Will it result in additional winter use of critical deer winter range, and how will that affect wintering deer?

# Commenter 389

**Response:** We do not agree that the Executive Order or the Travel Management Rule require that the project give deference to the needs of wildlife over public access or recreational opportunities. The terrestrial wildlife cumulative effects analysis does not describe increased

impacts upon the Pacific deer herd due to implementing a seasonal closure under the Action Alternatives. This is because: 1) the Rock Creek recreational trail area provides 13 percent of the critical winter range for the Pacific deer herd, and as such, actions taken on the remainder of the herd's critical winter range are likely to have greater overall effect upon the herd; 2) the Rock Creek area does apply a wet weather closure that will partially overlap the closures proposed in the various Action Alternatives. Given these two factors, it is both difficult to estimate changes in use in the Rock Creek area associated with a seasonal closure, and it appears unlikely that changes in use would result in increased impacts upon the Pacific deer herd.

11. Environmental harm of ORVs, disruption of habitat for wildlife, loud vehicle noises making wildlife leave the area.

# Commenter 89

**Response:** These, and a number of additional road and trail-associated factors, have been analyzed in Chapter 3 of the EIS, Terrestrial Wildlife Environmental Consequences Section.

12. Pacific Deer Herd population data shows an increasing population during the same time frame as increasing OHV use in the Rock Creek area. A study done by the USFS with greensticker monies found no ill effects of OHV use to the deer herd health. Thus there should be no closures or seasonal closures to "protect" the deer because there are no effects from OHVs on the deer. See comment.

### Commenter 1030

Response: The response of individual deer or deer populations to recreation uses has been studied and considered in depth during the many years of planning for the Rock Creek Recreational Trails Area. Despite such efforts, the limited number of scientific studies available, the limitations of these studies, and their variable findings, leave considerable uncertainty about the response of individual deer or deer populations to recreation uses (Barrett et al. 2004). In addition, the status of the Pacific deer herd population is not well understood since population trend estimates made by the California Department of Fish and Game include a substantially larger area encompassing a number of additional deer herds in Central Sierra Nevada. Recognizing these uncertainties, none of the action alternatives proposes a seasonal closure for the protection of deer. Seasonal closures implemented for the purpose of avoiding wet weather damage to roads and trails and reducing impacts of soil erosion, may, nonetheless, benefit wintering deer.

13. Snowmobile effects on wildlife (see comment for detail): noise and disturbances should be a consideration in the protection of wildlife and snowmobile use is just a significant as wheeled vehicles with respect to survival of threatened and endangered wildlife. Snowmobiles currently are allowed to travel cross-country with little or no regulation thereby making them a particular high source of disturbance.

# Commenter 1072

**Response:** The purpose and need of the Travel Management Plan is to designate routes for wheeled motor vehicle use as provided in 36 CRF XXX 212 Snowmobile use is outside the scope of this assessment.

14. The statement that trails fragment forests is an inflated statement and should be corrected; Commenter 386

**Response:** Additional information has been added to the FEIS, Terrestrial Wildlife Environmental Consequences section, clarifying that trails, with their narrower width, result in little or no reduction in forest cover. For wildlife species dependent on forest cover, trails

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are less likely to result in negative edge effects or habitat fragmentation as compared to roads.

15. The FS statement that since alt. A has twice the amount of routes, there is twice the possibility of vehicle intrusion is irrational given its failure to even consider the location of the routes to existing habitat and nest sites;

#### Commenter 386

- **Response:** Analysis of environmental consequences to wildlife is specific to species habitats and occurrences throughout the FEIS. The proportion of species' habitat that is influenced by the location of routes is described as Indicator Measure 3 and the location of routes in relation to known sensitive sites is displayed as Indicator Measure 4 of the Terrestrial Wildlife environmental consequences analysis. The location of routes in relation to known spotted owl and goshawk habitat and nest sites is shown in Tables 3-28 through 3-33 of the Terrestrial Wildlife Environmental Consequences Section.
- 16. This EIS provides the time and place to amend the LRMP, allowing a greater trail density than 2.5 on deer winter range, when a site-specific analysis shows concerns can be mitigated. We support a trail density in deer critical winter range, but the lack of scientific bases has not provided a meaningful mitigation credit for wildlife disturbances in the decision making process. Commenter 385, 386
  - The Rock Creek Recreation Area is outside the scope of this analysis. Adding the mileage from that area produces inaccurate totals, and causes an incorrect understanding of the data that actually is within the scope of this analysis. Please remove ALL calculations that add the Rock Creek rec area to any total mileage calculation.

# Commenter 1001

- Response: The Rock Creek recreational trails area is outside the scope of the Eldorado Travel Management Project, as described by the commenter. As such, "Direct and indirect effects are analyzed on National Forest lands within the project boundary (exclusive of the Rock Creek Recreational Trails area)" (Chapter 3, Terrestrial Wildlife). Cumulative effects, however, are defined as by NEPA regulations as the effect on the environment that results from the incremental effect of the action when added to the effects of other past, present and reasonably foreseeable future actions. For terrestrial wildlife species, the area to be analyzed in a cumulative effects analysis is generally not limited to the project area since the area must be large enough to provide appropriate context for a reasonable determination of effects to wide-ranging species. For this reason, the Analysis Framework in the Terrestrial Wildlife Section describes that "Cumulative effects encompass motorized uses and additional activities occurring on all lands (both public and private) within the Eldorado National Forest boundary." In both tables and text, these pre-existing effects are displayed independent from the direct and indirect effects of the project.
- 17. The Report "Assessing the Cumulative Effects of Linear Recreation Routes on Wildlife Habitats on the Okanogan and Wenatchee National Forests" was never intended to be a project planning model or tool yet, in Chapter 3, that is exactly how it is being used. It is intended to be used as a hypothetical model for monitoring indicated by the statement: "Until additional research becomes available, the assessment processes identified should be considered as working hypotheses on which monitoring could be designed to test their validity."

Commenter: 1001

**Response:** Models are commonly used for the purpose of estimating or quantifying effects in a consistent manner when comparing alternative actions. Models have the advantage of using clearly described assumptions and providing a consistent methodology for measuring and

describing effects. Models generally require making assumptions when faced with less than perfect knowledge. For this reason, the model developed by Gaines and others (2003), is described as a "working hypotheses" that should be further refined as additional studies provide better information upon which to base assumptions. This does not make the model inappropriate to use for evaluating effects of Travel Management Plan alternatives. In fact, in summarizing their report, the authors state "The information provided in this review, and subsequent development and application of cumulative effects models, improves the knowledge base that can be used to evaluate project proposals and make informed decisions." The authors further recommend that managers "use an adaptive management approach to address wildlife and recreation interactions because of the complexity and uncertainty of these issues." We agree. The Implementation Strategy specifies that, within one year of the decision, the Forest will develop a process for considering additional routes or changes in the management of the designated system thereby providing a process for adapting to new information and findings.

18. Request that Terrestrial Wildlife Environmental Consequences section be revised to clarify that the presence of an open motorcycle route will have no effect on the abundance of snags and down woody material.

Commenter: 1001

**Response:** Clarification has been added to Chapter 3, Environmental Consequences, to describe that impacts upon snags and down wood are expected to occur along roads but would not be influenced by the presence or use of motorized trails.

19. A highly appropriate consideration for a Travel Management analysis would be to simply prohibit all wood cutting along roads and to end the Forest Service activity of removing hazard trees, because the need to reduce the negative effects on nearby PACs and HRCAs supersedes concerns about public safety. Please remove the assumption that "declines in average levels of snags and woody material near roads can be expected."

Commenter: 1001

**Response:** None of the Action Alternatives proposes to change Forest Service woodcutting or hazard tree removal policies. Such sweeping policy changes are outside the scope of this project as they would require analysis of alternatives and options having little connection to the Purpose and Need of the Travel Management Plan. Limitations on woodcutting could be considered in future analyses if needed, but, at present, woodcutting and hazard tree removal along roads is an indirect effect associated with the proposed Alternatives. Effects upon snags and down wood did not influence the specific routes proposed in the various Alternatives.

20. Chapter 3 in its entirety is an attempt to create the requirement that there be no effect whatsoever, using only one management tool: eliminating all human interaction with wildlife. This is in violation of both the letter and the spirit of NEPA. In light of the fact that Standards and Guidelines in the ENF LRMP direct that impacts be mitigated where there is documented evidence of disturbance to the nest site from existing road or motorized trail use, and the Forest has not monitored nest sites in proximity to roads and has not documented specific instances of disturbance, the use of the Gaines model as the primary planning tool is not only inappropriate, it is unnecessary.

Commenter: 1001

**Response:** The comment reflects some confusion about the requirements and purpose of environmental analysis performed under NEPA. NEPA requires that the agency "estimate the direct, indirect, and cumulative environmental effects that would result from implementing each of the alternatives." NEPA does not dictate a particular outcome or decision based

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upon environmental analysis. As such, an analysis that uses simple geographic information system-based models to evaluate the cumulative effects of recreation routes on habitats for selected wildlife species, (such as that described by Gaines et al. 2003), is an appropriate way to estimate environmental effects but does not prescribe a particular action. This is evidenced by the fact that Action Alternatives in the EIS for the Forest Travel Management Plan propose from 1,838 to 1,338 miles of routes open to public motor vehicle use. The Travel Management EIS does not propose an alternative that "closes the Forest" to motorized use or to recreational users in general, nor does it propose an alternative that eliminates risk of disturbance to nesting spotted owls or goshawks (though Alternative E reduces such risks). Disclosing the effects of recreational activities upon wildlife species and habitats does not necessitate eliminating such effects; in many instances it may be impossible or undesirable to so, as alluded to in this comment.

21. In relation to spotted owl disturbance, D36 want the standard for designating existing routes to be the existing ENF LRMP S&.G, that is, for existing roads and trails, mitigate only when documented evidence of impacts is recorded. In the absence of evidence, the route can be designated. In the event of evidence, conduct a site-specific analysis to determine mitigation, with rerouting the first option.

Commenter: 1001

- Response: LRMP S&G's establish minimum resource protection standards. All Action Alternatives were designed to be compliant with the LRMP S&G stating, "mitigate impacts where there is documented evidence of disturbance to the nest site from existing recreation, off highway vehicle route, trail, and road uses (including road maintenance)." As this comment requests, none of the Alternatives proposed closing existing routes to public use due to their proximity to a spotted owl or goshawk nest site. (NF system routes that are currently maintained for public use are existing routes). LRMP S &G's additionally state, "evaluate proposals for new roads, trails, off highway vehicle routes, and recreational and other developments for their potential to disturb nest sites." In responding to this Standard and Guideline as well as the management objectives for spotted owl Protected Activity Center habitat, Alternatives E and Modified B generally avoided designating unauthorized routes or ML1 roads that occurred in spotted owl or goshawk PACs or in proximity to nest sites. In Modified B exceptions were made where routes occurred along the edge of a spotted owl or goshawk PAC, and for 3 routes that were determined to be particularly important for the transportation system.
- 22. Delaney et al. cautioned readers of his work to use the information only when it might be truly comparable. ENF staff has totally disregarded this caution, and instead has used this research to convey the false impression that motorcycles nearby an owl activity center pose a "risk." Instead of using the reference to chainsaw or helicopter disturbance as a metric for evaluating motor vehicle disturbance risk, information on noise attenuation and hearing frequencies should be used. Using such information, it is entirely possible to say that the owls do not even hear the motorcycles! D36 wants you include the data on noise attenuation in this discussion because it is entirely consistent with the USFWS and USFS research cited above.

Commenter: 1001

Response: Forest staff have reviewed the information provided in comments and additional research on noise attenuation and wildlife effects, in order to better analyze potential effects to spotted owls and goshawks. In 2006, the U.S. Fish and Wildlife Service conducted an exhaustive review of the literature on auditory and visual disturbance to birds in its report entitled, "Estimating the Effects of Auditory and Visual Disturbance to Northern Spotted Owls and Marbled Murrelets in Northwestern California" (2006). This report provides a comprehensive review of the available literature and, based on the literature, provides

guidance for estimating the potential effects of noise and visual disturbance upon spotted owls. Chapter 3 of the EIS has been modified to incorporate this information and to use the noise categories suggested by the U.S. Fish and Wildlife Service for estimating distances at which spotted owls may be "harassed" by auditory stimuli. These categories were developed by "calculating attenuation rates of sound across habitat conditions representative of the forest habitat occupied by spotted owls and murrelets," and address noise from motor vehicles. In Chapter 3 the effects are described as "potential" because of the recognition that that there are numerous variables that influence the effect that noise and visual disturbance may have upon birds.

23. The ENF staff has omitted from the Delaney citation the information most crucial to what risk" could be associated with motorcycles or ATV's nearby. The first critical omission is the fact that there was no difference in the success rates of pairs who were subjected to the noise treatments and the pairs that were not. Delaney "et al." also found that owls did not flush during any noise treatment while incubating eggs; this is confirmed by other research that owls are very reluctant to flush from incubating eggs and in fact did not flush during the Delaney noise treatments. And Delaney found no difference between the rates of prey delivery to noise treated nests and prey delivery to untreated nests.

Commenter: 1001

- Response: The U.S. Fish and Wildlife Service reviewed the studies conducted by Delaney et al. (1999), but arrived at different conclusions regarding the potential effects to spotted owls. The U.S. Fish and Wildlife Service report states: "the spotted owls studied by Delaney et al. (1999) never flushed during the incubation and nestling phases in the chainsaw and helicopter tests...However, Delaney et al. (1999) did observe relatively frequent flushes from branches up to 60 meters from the disturbance during the later part of the nesting period...As stated above, we are concerned that an adult spotted owl flushing from a branch when the juveniles are no more than one month of age could result in a missed feeding. So, to include the observations of Delaney et al. (1999) concerning flushes during the later part of the nesting season, the combined injury threshold for chainsaws is increased to 65 yards (60 meters)." Review of the literature lead the Fish and Wildlife Service to conclude that "Activities that create elevated sound levels or result in close visual proximity of human activities at sensitive locations (e.g. nest trees), have the potential to significantly disrupt normal behavior patterns." They concluded that "harassment may occur when owls demonstrate behavior suggesting that the safety or survival of the individual is at significant risk, or that a reproductive effort is potentially lost or compromised." Examples of this behavior included but were not limited to 1) flushing or an adult or juvenile from a nest during the incubation, brooding, or fledging period, 2) abandonment of a feeding attempt of a dependent juvenile for an entire daily feeding period, or 3) delays of feeding attempts of dependent birds on multiple occasions during the breeding season.
- 24. All the routes placed in any type of "risk of disturbance" category or polygon should be removed from any risk category and re-evaluated using the "documented evidence" standard. In particular, D36 wants the .25 mile standard to be abandoned, and no new (polygon-oriented) standard considered.

Commenter: 1001

Response: LRMP Standards and Guidelines, such as the standard requiring the forest to mitigate impacts where there is "documented evidence" of disturbance to spotted owls or goshawks, serve the purpose of guiding or directing forest management actions, and provide minimum protection measures—not maximums. Standards and Guidelines are not measures for estimating the direct, indirect, and cumulative environmental effects that would result from implementing project alternatives. Available studies indicate that visual or auditory

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disturbance of nesting spotted owls or goshawks is a potential direct effect of the action. The lack of "documented evidence" associated with particular routes on the Eldorado National Forest does not negate the potential for effects, particularly since such effects are difficult to observe or quantify under ordinary field conditions (USDI Fish and Wildlife Service 2006b). Failure to disclose potential effects would not comply with NEPA requirements for agencies to take a hard look at the environmental impacts of their actions.

# **Unauthorized Route**

1. Routes that have been in use for decades have gone from "routes in an open area" to "user created routes" and finally to "unauthorized routes" regardless of whom may have made the route. It is difficult to not see the bias in calling trails "unauthorized" when Forest Service Designation for the land. They are on clearly allowed for this type of use.

### Commenter 61, 193

- Response: In the Travel Management Rule, an unauthorized road or trail is defined as a road or trail that is not a forest road or trail or a temporary road or trail and that is not included in a forest transportation atlas. Unauthorized trails consist of both user created trails and forest trails where public wheeled motor vehicle use is not authorized. As a part of route designation, the FS will release a motor vehicle use map (MVUM) yearly. Based on trail monitoring, public input, and budget constraints, new routes may be added to the system, existing routes may be removed from the system or the system may remain unchanged.
- 2. The analysis proves that very little of the ENF is remote, after the proliferation of ORV routes during the unregulated era. More than 500 miles of ORV routes have been created by ORVs driving off forest roads without any authorization. Most of those routes can't meet the test of erosion resistance, and they have degraded the ENF of wildlife habitat. Moreover, those unauthorized routes bring the ATVs, dirt bikes and jeeps into areas where the public goes in search of a quiet place for a picnic, an overnight camp, or a day of trout fishing. Most of these authorized routes should be closed and restored to nature.

# Commenter 174

- **Response:** The Travel Management rule requires public wheeled motor vehicle travel be confined to designated routes and the prohibition of cross-country travel. User compliance, enhanced through education and enforcement, will greatly reduce or eliminate the proliferation of unauthorized routes. In Modified B, 27 miles of unauthorized routes will be brought into the NF System and allow public wheeled motor vehicle use, while 551 miles of unauthorized routes will not allow public motorized use.
- 3. The statement "in their enjoyment of the NF, motor vehicle users have created numerous unauthorized routes" is purely assumption. Maybe it applies to logging roads and lower elevation routes; high elevation trails historically are created by horsemen. Most, if not all, motorcyclists don't create trails.

### Commenter 1

Response: In order to compile the route inventory used in this project, the ENF undertook an extensive effort to spatially locate all of the NFS roads and trails along with the unauthorized routes which showed current or past motor vehicle use and which could be interpreted as travel ways for motor vehicles. The statement "in their enjoyment of the NF, motor vehicle users have created numerous unauthorized routes" is based on the verification that current or past motor vehicle use was evident. Also, many unauthorized routes developed on NFS ML-1 roads which, although constructed by the FS and part of the NF system, are classified as intermittent roads not open for use by the FS or the public.

4. Ch. 3, p. 82 of the DEIS states: "Route condition was compiled through an office exercise relying on staff knowledge of ML-1 and ML-2 roads, as well as a handful of more notable unauthorized routes...these evaluations have not been ground verified." According to BRC comments on the National Travel Management Rule and FS Strategic Communication Plan, any designation process must comply with the Final Travel Management Rule. The SCP and the Final Rule make it clear that the Forest cannot ignore the possibility of designating unauthorized or user-created routes.

# Commenter 386

Response: The above statement from the DEIS is in the Water and Riparian Resources section of Chapter 3 and was referring to the level of stream sedimentation needing further evaluation, not the routes themselves. In the FEIS, that section has been renamed Hydrology and Aquatic Resources and has been modified in order to provide a more clear description of the analysis. The Travel Management Rule states that unauthorized routes are not part of the national forest transportation system and are not recognized as by the Forest Service. However, we do recognize that some unauthorized routes provide motorized recreation opportunities and would enhance the designated route system, so 27 miles of unauthorized routes will be brought into the NF System and allow public motor vehicle use.

5. Clarify reasons for changing status of often-used routes across alternatives Commenter 417

Response: The NEPA regulations require that a range of alternatives be described, discussed, and analyzed in the EIS (40CFR1502.14). The range of alternatives presented in this EIS was developed in response to the significant issues identified from scoping of the proposed action and each alternative was designed to address different aspects of the significant issues. After internal development, the preliminary alternatives were presented to the public. The purpose of this effort was to acquire additional public input on the range of alternatives being considered, before the DEIS was released. Based on these meetings, adjustments were made to the alternatives before the environmental analysis was conducted. Finally, an additional alternative was developed following the release of the DEIS, based on the review of the public comments received during the 90 day comment period.

6. DEIS statement "Unauthorized routes on which public wheeled motor vehicles will continue" is unexplained

### Commenter 64

**Response:** This statement applies to Alternative A, the No-Action alternative. Since no action is taking place and cross-country travel would not be prohibited, motor vehicle use on unauthorized routes would not be prohibited and, thus, use on unauthorized routes will continue.

7. "In their enjoyment of the National Forest, motor vehicle users have created numerous unauthorized routes. The number of such routes continues to grow each year, with many new routes having environmental impacts and safety concerns that have not been addressed." The above narrative is False.

### Commenter 53

Response: As outlined in Chapter 2 of the FEIS, the ENF undertook an extensive effort to spatially locate all of the NFS roads and trails along with the unauthorized routes which showed current or past motor vehicle use and which could be interpreted as travel ways for motor vehicles. The statement "in their enjoyment of the NF, motor vehicle users have created numerous unauthorized routes" is based on the verification that current or past motor vehicle use was evident on unauthorized routes. In the Travel Management Rule, an unauthorized

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road or trail is defined as a road or trail that is not a forest road or trail or a temporary road or trail and that is not included in a forest transportation atlas. Also, many unauthorized routes developed on NFS ML-1 roads which, although constructed by the FS and part of the NF system, are classified as unauthorized as public wheeled motor vehicle use is prohibited. Based on the professional judgment of ENF field personnel and resource specialists, it is our view that the proliferation of unauthorized routes by motor vehicles is continuing. In addition, we have determined that a portion of those routes are adversely impacting both Forest resources and visitor safety.

8. In the Purpose and Need of the DEIS is states: "In their enjoyment of the NF, motor vehicle users have created numerous unauthorized routes. The number of such routes continues to grow each year, with many new routes having environmental impacts and safety concerns that have not been addressed." I have seen no evidence provided by the FS that the above statement is true. There is no justification for "blaming" motor vehicle users for their creation. As long as cross-country travel is allowed to hikers, equestrians, and mountain bikers route proliferation will continue to occur.

#### Commenter 152

Response: As outlined in Chapter 2 of the FEIS, the ENF undertook an extensive effort to spatially locate all of the NFS roads and trails along with the unauthorized routes which showed current or past motor vehicle use and which could be interpreted as travel ways for motor vehicles. The statement "in their enjoyment of the NF, motor vehicle users have created numerous unauthorized routes" is based on the verification that current or past motor vehicle use was evident on unauthorized routes. In the Travel Management Rule, an unauthorized road or trail is defined as a road or trail that is not a forest road or trail or a temporary road or trail and that is not included in a forest transportation atlas. Also, many unauthorized routes developed on NFS ML-1 roads which, although constructed by the FS and part of the NF system, are classified as unauthorized since public wheeled motor vehicle use is prohibited. Based on the professional judgment of ENF field personnel and resource specialists, it is our view that the proliferation of unauthorized routes by motor vehicles is continuing.

# **Use Conflicts**

1. Urge FS to stop all motorized use anywhere it conflicts with traditional non-invasive recreation such as hiking, photography etc. to avoid noise pollution.

Commenter 343, 640

**Response:** Thank you for your comment. National Forests are managed by law for multiple use. They are managed not only for the purposes stated in these comments, but for timber, grazing, mining, and motorized recreation. These uses must be balanced, rather than one given preference over another.

2. There will be conflict between hikers and riders. This conflict will force non-motorized users onto smaller areas of the Forest.

Commenter 1053

**Response:** Thank you for your comment. As stated in the Travel Management Rule as part of the evaluation criteria for designating roads and trails where motor vehicle use will be allowed, the Forest Supervisor must consider the effects of route designations on conflicts among uses of NFS lands. The Recreation section in Chapter 3 of the FEIS discusses the possible conflicts among uses that would result from implementing each of the alternatives.

3. The DEIS states "ORV use must be appropriate to the landscape and other public activities"

(338) but ch. 3 does not address the impact on user conflict on the trails.

Commenter 338, 755

Response: Thank you for your comment. Thank you for your comment. As stated in the Travel Management Rule as part of the evaluation criteria for designating roads and trails where motor vehicle use will be allowed, the Forest Supervisor must consider the effects of route designations on conflicts among uses of NFS lands. The Recreation section in Chapter 3 of the FEIS discusses the possible conflicts among uses that would result from implementing each of the alternatives.

4. Motorized vehicle use on NFS lands is an ever-increasing activity that creates serious conflicts with other users while damaging Forest resources.

Commenter 65, 254, 382

**Response:** Thank you for your comment. As stated in the Travel Management Rule as part of the evaluation criteria for designating roads and trails where motor vehicle use will be allowed, the Forest Supervisor must consider the effects of route designations on cultural and natural resources and conflicts among uses of NFS lands. Chapter 3 of the FEIS discusses the possible effects of implementing each of the alternatives.

5. DEIS includes statements about the need to reduce user conflicts. The requirement is to minimize conflicts in use as it relates to land use and types of activities (EO 11644).

Commenter 385

Response: Thank you for your comment. As stated in the Travel Management Rule as part of the evaluation criteria for designating roads and trails where motor vehicle use will be allowed, the Forest Supervisor must consider the effects of route designations on conflicts among uses of NFS lands. The Recreation section in Chapter 3 of the FEIS discusses the possible conflicts among uses that would result from implementing each of the alternatives.

6. Wheeled vehicles should not be used on roads critical to non-motorized winter recreation, especially: Loon Lake non-motorized winter recreation area, all roads leading to Van Vleck bunkhouse, all roads leading to Robbs Peak, the road to Echo Lakes, and the road to Woods Lake.

Commenter 1045

Response: Based on your comments, and the comments of others, Alternative B was modified.

Included in Modified B are wheeled over the snow prohibitions on Mormon Emigrant Trail
(10N50/Forest Route 5) from the junction of Silver Fork Road (11N40) southeast to the Iron
Mountain SnoPark at Highway 88, Loon Lake Campground Road (13N17), Chipmunk Bluff
Road (13N19), and Robbs Peak Road (13N31)

7. Conflicts between motorized and non-motorized users, as stated on pg. 44 in Ch. 2 of the DEIS, is not an issue on the ENF and no studies in the DEIS support this statement. With over 500,000 acres available for quiet recreation, non-motorized users can avoid OHVs.

Commenter 1059, 1060, 1079

**Response:** Thank you for your comment. The Evaluation Criteria in the Travel Management Rule require the Forest Supervisor to consider, among other things, conflicts among uses of NFS lands when designating roads and trails for public wheeled motorized use.

8. Present conflicts between motorized and non-motorized users needs to be resolved before motorized access is increased.

Commenter 361

Response: Thank you for your comment.

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9. I don't believe there is much conflict between the different user groups in the forest. On those few occasions where I have come across someone in such an encounter, EVERY instance was one where they MISTAKENLY thought we were on a trail that did not allow motorized use (Lovers Leap trail 17E12 is a recent example).

# Commenter 152

- **Response:** Thank you for your comment. The Implementation Strategy in Chapter 2 of the FEIS includes elements to develop a public education strategy which among other tasks, will work to educate all forest users about the rules and regulations of the Travel Management decision.
- 10. The Executive Order requires minimizing conflict in use (EO11644). There should be no requirement for the FS to reduce user conflict, as stated in the DEIS, as it relates to land use and types of activities, as this would require behavior modification which is well beyond the scope of the DEIS.

Commenter 385, 386

- **Response:** Thank you for your comment. As stated in the Travel Management Rule as part of the evaluation criteria for designating roads and trails where motor vehicle use will be allowed, the Forest Supervisor must consider the effects of route designations on conflicts among uses of NFS lands. The Recreation section in Chapter 3 of the FEIS discusses the possible conflicts among uses that would result from implementing each of the alternatives.
- 11. Illegal vehicle activity is causing ever-increasing damage to our ever-more crowded forest. Logic dictates that as more people use the forest, we must shift to less-damaging activities.

Commenter 1053

Response: Thank you for your comment. National Forests are managed by law for multiple uses.

Commenter 383

**Response:** Thank you for your comment. As stated in the Purpose and Need in Chapter 1 of the FEIS, this project is to designate roads and trails for public wheeled motor vehicle use by class of vehicle and season; and to prohibit cross-country travel. Designating trails for non-motorized uses is beyond the scope of this project.

# Wilderness

1. The two wilderness areas of the ENF need better protection against the noise of ORVs. The Mokelumne Wilderness should be protected by closing route 17E24 which runs more than 7 miles along the wilderness boundary, and route 17E21 which runs up to the boundary. The Desolation Wilderness should be protected by closing route 11N26F, which goes all the way to the wilderness boundary. Alternative E closes both these routes. The radiating noise from vehicles roaring along these routes is one problem; the temptation to drive on into the wilderness is another. ORV routes should be kept away from wilderness boundaries.

Commenter 173, 174, 175

**Response:** Thank you for your comment. The effect of noise from wheeled motorized vehicles is discussed within the Wilderness section of Chapter 3.

2. Routes that accommodate illegal OHV access to the Pacific Crest Trail and other Wilderness areas should not be designated; the most logical way to prevent illegal OHV use in wilderness is to avoid designating access routes that encourage such intrusions.

Commenter 389

**Response:** Thank you for your comment.

3. Proposed Caples Creek Wilderness should be totally free of motorized vehicles.

Commenter 1031, 1032, 1034, 1051, 1072

**Response:** Thank you for your comment.

4. Comparing Wilderness acreage against people who use these areas shows an imbalance compared to the small number of land OHV's have.

Commenter 356

Response: Thank you for your comment.

# Withdraw DEIS

1. Reconsider your plan to close trails and routes

Commenter 8, 64, 401, 425, 436, 438, 565

Response: Thank you for your comment.

2. Withdraw the current DEIS and do a SEIS and consider additional alternatives that increase motorized opportunities.

Commenter 22, 64, 93, 158, 177, 181, 182, 186, 187, 188, 190, 191, 192, 209, 215, 220, 230, 231, 353, 360, 378, 383, 403, 443, 601, 651, 672, 673, 676, 677, 679, 716, 717, 718, 755, 776, 786, 801, 821, 881, 891, 973, 1028, 1038, 1046, 1047, 1059, 1100, 1108, 1109

Response: Thank you for your comment. Based on the comments received in response to the DEIS, the Forest Supervisor did not find a compelling argument to warrant withdrawing the DEIS or the need for a supplement to the DEIS. National FS policy directs each National Forest to complete Travel Management planning. A Federal Court decision directs the ENF to complete travel management planning on the ENF by April 2, 2008. Therefore, the Forest Supervisor has determined that the FEIS would be completed. However, a new alternative

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- was developed, based in part on the comments and suggestions in the many responses received. This new alternative provides a high level of access for public recreation while still minimizing impacts to meadows and certain sensitive wildlife habitat, and reducing impacts to stream courses and riparian habitat.
- 3. Concerned about limitations of the Alternatives. I know from past experiences that when some of our public lands get closed for various reasons, the chances of them re-opening at a later date are pretty much never. Additionally, it makes no sense to me to "close" more trails when there are more users.

Commenter 1060

**Response:** Thank you for your comment.

4. CSNC disagrees with eliminating the following alternative from detailed study: Limit ATV, truck, and automobile use to NFS roads. Do not allow these vehicles on trails or going cross-country. This is a reasonable alternative. There are thousands of miles of roads offering a wide variety of experiences for these vehicles. The ENF LMP identified no trails for ATV use, so this alternative could not be inconsistent with current design or historical use.

### Commenter 389

- Response: As described in Chapter 2 of the FEIS, this alternative was considered but eliminated from detailed analysis because it did not "provide a diversity of road and trail opportunities for experiencing a variety of environments and modes of travel consistent with the National Forest recreation role and land capability" pursuant to FSM 2353.03(2) and did not "provide a diversity of public wheeled motor vehicle recreation opportunities." Motorized trails serve a diversity of opportunities for different types of wheeled motor vehicles. Certain trails have been designed for, or have been historically used by wheeled motor vehicles such as 4WDs and ATVs. Limiting these wheeled motor vehicles to NFS roads only would fail to provide a diversity of road/trail opportunities and a balance of experiences for the various wheeled motor vehicle classes. FS trail design standards have been developed for ATV and 4WD trails (FSH 2309.18). The ENF LRMP established standards and guidelines regarding OHV use on the ENF, and these standards and guidelines do not prohibit that use in the general forest.
- 5. CSNC disagrees with eliminating the following alternative from detailed study: Designate event only trails; there should be no event only routes. Experience shows these trails are rarely closed post-event. A route deemed unsuitable for normal use would likely be even more unsuited to more destructive event use.

# Commenter 389

- Response: This travel management project addresses public wheeled motor vehicle use and does not address uses or activities authorized under a separate special use permit or other authorization. Event only trails are specific routes that are authorized for a specific use under a separate special use authorization, and are not open for public motor vehicle use, except during the event and for specific activities authorized as a part of the event. Current regulations allow for use of routes when authorized under a separate special use permit. As described in Chapter 2 of the FEIS, designating event only trails was not identified as part of the purpose and need for this project and is outside the scope of the project. Therefore, this alternative was eliminated from detailed study.
- 6. Alternative C is labeled 'proposed action' when it is really Alternative D, the 'preferred alternative' that you plan to implement. This is misleading to the reader.

Commenter 339, 417

Response: This point was raised by individuals during the public meetings and through the comments received. The FEIS has been revised to clarify the differences between the Proposed Action and the Preferred Alternative. In Chapter 1 of the FEIS, the Proposed Action is explained as the Forest Supervisor's proposal as outlined in the NOI published in the Federal Register on October 26, 2005 and subsequently modified. The Proposed Action is the initial proposal, prior to receiving public comments and completing the environmental effects analysis. The Preferred Alternative is the alternative the Forest Supervisor has identified as being the one that he feels best meets the purpose and need for the project.

 Plan does not take into consideration the original intent of National Forest 'multiple use' system

Commenter 142, 620

Response: As described in Chapter 1 of the FEIS, the purpose of this Travel Management project is to provide a diversity of road and trail opportunities for experiencing a variety of environments and modes of travel consistent with the National Forest recreation role and land capability. The national Travel Management recognizes that the National Forests should provide access for motorized and nonmotorized users in a manner that is environmentally sustainable over the long term (Fed Reg V.70, No. 216, p 68266). Providing for multiple uses of the National Forests does not mean that all uses will be allowed on all lands, but rather that the various resources (including recreation) will be managed "so that they are utilized in the combination that will best meet the needs of the American people." (Multiple Use-Sustained Yield Act of 1960).

8. Consider additional alternatives to those presented in DEIS.

Commenter 1019

**Response:** Alternative B was modified between the DEIS and FEIS, based in part on the comments and suggestions in the many responses received. Modified B provides a high level of access for public recreation while still minimizing impacts to meadows and certain sensitive wildlife habitat, and reducing impacts to stream courses and riparian habitat.

9. The alternatives proposed are unacceptable because they won't work and they inadequately address the problem.

Commenter 1036

**Response:** Thank you for your comment.

10. Within all of the studied Alternatives, very few destination-to-destination routes exist. Not one east to west or north to south route. Any attempt to do this within the ENF failed, in addition to consideration between County-to county or neighboring forests-to-forests is proposed. Every Alternative except "A" simply closed trails and not one new linkage or new connection trail is proposed. I, therefore, request that a very specific statement in the final alternative selected state: "This alternative is the starting point in developing a thorough system of inter-connection trails within the ENF and adjoining forests in the years to come."

Commenter 154

Response: There are a number of destination to destination routes included in many of the alternatives, such as the motorcycle trail to the top of Lover's Leap (NFS trail 17N12), the 4WD route along the north side of Hell Hole Reservoir (NFS road 14N09A, and the route to Barrett Lake (NFS road 11N26F). In addition, there are various routes in each alternative that allow travel between adjacent counties. The Forest Supervisor recognized at the initiation of this Travel Management project that it is to establish the "backbone" of a travel management system. The Implementation Strategy presented in Chapter 2 of the FEIS includes an element, whereby the ENF will work with a collaborative group of public

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stakeholders to develop a process for considering the addition of routes or changes in management of the designated system. This strategy is consistent with the national Travel Management regulations at 36 CFR 212.54, which provide for revision of designations as needed to meet changing conditions, including the potential to add new routes following public involvement and site specific environmental analysis.

11. I am very disappointed in the plans proposed due to the fact that it seems that "less is always better" for motorized vehicle users. There were no pro-recreation alternatives presented in the plan.

# Commenter 167

- Response: Thank you for your comment. The purpose and need for this Travel Management project presented in Chapter 1 of the FEIS does include providing for recreation opportunities on the ENF through a diversity of road and trail opportunities for experiencing a variety of environments and modes of travel consistent with the National Forest recreation role and land capability. The effects analysis presented in Chapter 3 of the FEIS describes that as the miles of roads and trails that allow motor vehicle use decreases, there is a reduction in opportunities for some forms of recreation and improved conditions for some other recreation opportunities. The Recreation section of the effects analysis (Chapter 3 of the FEIS) does not conclude that "less is always better" for motorized vehicle users.
- 12. The intent of the E.O.s is to minimize the impacts of OHV use on forest resources and other recreationists and neighbors. The EIS must not only disclose and compare the impacts of each alternative, it must provide a plausible reasoning that the Decision that results from the disclosures in fact, minimizes those impacts.

#### Commenter 389

**Response:** Thank you for your comment. The summary description of the alternatives in Chapter 2 of the FEIS has been modified to describe how each alternative meets the criteria in the Travel Management regulations (consistent with E.O. 11644 and E.O. 11989).

13. What Alternative does the Forest Service want to see implemented?

### Commenter 1

- **Response:** Thank you for your comment. The Forest Supervisor identified Alternative D as the Preferred Alternative in the DEIS. However, based on public comments and other information, a new alternative was developed between the DEIS and FEIS. This alternative is shown in the FEIS as the Forest Supervisor's Preferred Alternative.
- 14. I am significantly mystified as to the particular bases or reason for ENF's decision to recommend closure of particular trail sections and/or bypasses from the recommended list. I am unaware of any stated reason for the recommended closure of certain areas. Because of the lack of stated reasons for closure, it is difficult to directly address the concerns of ENF that have resulted in the recommended deletions.

#### Commenter 8

- Response: Thank you for your comment. In response to this comment and other similar comments, Appendix G has been added to the FEIS to list the specific reasons for not allowing public wheeled motor vehicle use on individual NFS ML-2 roads in Modified B. NFS ML-1 roads, NFS trails, and unauthorized routes were analyzed by considering whether they enhance recreation opportunities and or whether there are resource concerns as well as whether they comply with ENF LRMP standards and guidelines.
- 15. Don't close an entire trail due to a specific sections that may have special issues- reroute, etc. Commenter 680

Response: Thank you for your comment. The Forest Supervisor recognized at the initiation of this Travel Management project that it is to establish the "backbone" of a travel management system. New construction, reconstruction and other ground disturbing activities are outside of the scope of this FEIS. The Implementation Strategy presented in Chapter 2 of the FEIS includes an element, whereby the ENF will work with a collaborative group of public stakeholders to develop a process for considering the addition of routes or changes in management of the designated system. This strategy is consistent with the national Travel Management regulations at 36 CFR 212.54, which provide for revision of designations as needed to meet changing conditions, including the potential to add new routes following public involvement and site specific environmental analysis.

16. Alternatives A-E hardly represent a range of alts, there is no OHV-friendly option among them, there is not a NEPA required No-change Alternative due to certain decisions in the beginning of this entire process- the absence of a no-change alternative for the DEIS is a fatal flaw, and sets it up for legal appeal that no sane citizen wants to finance with their taxes

Commenter 378

**Response:** In Chapter 2 of the FEIS there is an explanation of how Alternative A was created to be the No Action alternative. The remaining Action Alternatives were developed from the initial public scoping and other available information. A new alternative was developed between the DEIS and the FEIS, in response to the public comments received on the DEIS and other information.

17. Oppose further elimination of any trails from the DEIS alternatives.

Commenter 1047

**Response:** Thank you for your comment.

18. The five separate tables for each Alt makes it difficult to differentiate between them; one large side-by-side table would suffice; Route numbers are listed with no reference to their common name- without sharing this suggested there was specific intent against making the DEIS available for meaningful public review; there are multiple inaccuracies in the route listing- for example Barrett Lake is listed differently between pages 29, 291, 272

Commenter 378

**Response:** Thank you for your comment. Appendix F is a very large table, and it becomes difficult to understand and display when each of the alternatives are placed side-by-side. The Forest has worked to eliminate the errors or inaccuracies, such as the point you have raised concerning Barrett Lake Road (11N26F). This specific route has been tracked in the Forest's database as 11N26F, yet signed on the ground as 12N66, and both numbers were used in the DEIS. That error has been corrected.

19. Ask you to consider an option that doesn't allow more roads or ORV trails than is healthy for the forest.

Commenter 1051

**Response:** Thank you for your comment.

20. There is no consideration for the possibility of Open Area designation. This was the basic designation that the mountains have had for many years and they have remained in a very pristine state. Why is there no Open Areas considered in the plans as it would allow for play areas and these areas could be used to curb the enthusiasm of riders to prevent resource damage in more sensitive areas.

Commenter 61

C-180 Appendix C

- Response: Thank you for your comment. At the initiation of this Travel Management project and in the Notice of Intent published in the Federal Register on October 26, 2005, the Forest Supervisor proposed to identify the roads and trails where public wheeled motor vehicle use would be allowed, but did not propose to add areas to be open to travel. This was done in an effort to keep the scope of the project manageable and to be able to comply with the Federal Court mandated timeline. Future open areas may be considered at a later time under a separate, site-specific analysis.
- 21. There are very few trails designated for ATV or larger than 24-inch wide usage. Not providing and adequate trail system for them will only lead to more off-trail riding and also the destruction of single-track trails into ATV trails where they were not intended to go. It seems ATV trails were not considered in the proposal.

### Commenter 61

- **Response:** Thank you for your comment. Tables 2-12 and 2-16 in Chapter 2 of the FEIS show the number of miles of ATV trails proposed in each alternative and the number of miles of routes where ATVs are allowed to travel. All of the action alternatives show an increase in the number of miles of ATV trails over the No Action Alternative, as certain roads are converted to trails.
- 22. Dedicated ATV trail mileage is lacking, any road closure proposals need to look at road to ATV trail conversion and not just convert single track trails to ATV trails

Commenter 383

- **Response:** Thank you for your comment. Tables 2-12 and 2-16 in Chapter 2 of the FEIS show the number of miles of ATV trails proposed in each alternative and the number of miles of routes where ATVs are allowed to travel. All of the action alternatives show an increase in the number of miles of ATV trails over the No Action Alternative, as certain roads are converted to trails.
- 23. No way to connect to OHV trails from pavement

Commenter 676, 716, 717, 718

- Response: Thank you for your comment. All of the alternatives considered in this FEIS recognize that the California Vehicle Code will apply to motor vehicle use. The California Vehicle Code restricts where non-highway licensed vehicles can travel. It is recognized that it some instances, dual-sport motorcycles will allow riders to travel over the Forest using both trails and paved roads, whereas non-highway legal vehicles will be restricted. As described in Chapter 2 under the various alternatives, efforts were made to provide connections between popular routes for OHVs, and to provide travel opportunities across the Forest.
- 24. There are only 2 4WD driving trails in the county...

Commenter 302

- Response: Thank you for your comment. Many Forest visitors consider different routes as 4WD trials, depending on the individual's skill level and the vehicle they use. There are several NFS roads that many Forest visitors consider to be 4WD trails, including Barrett Lake 4WD trail (11N26F), Strawberry 4WD trail (10N13), Long Canyon 4WD trail (10N21) and Deer Valley 4WD trail (9N83). The Baltic Ridge 4WD trail (NSR 1046-A and NSR1046-C) is currently an unauthorized route, but is proposed to be open to public wheeled motor vehicle travel in all of the action alternatives. Table 2-12 in Chapter 2 of the FEIS shows that in each of the action alternatives, the number of miles of routes proposed to be managed in the future as 4WD trails increases over the current situation.
- 25. No currently-non-motorized trails should be designated for motorized use.

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Commenter 389

**Response:** Thank you for your comment.

26. Current preferred alt. does not meet the needs of the forest visitor or meet the standards of the rule

Commenter 885

Response: Thank you for your comment

27. Burden on OHV proponents to specifically justify keeping designated routes is unreasonable Commenter 8

Response: Thank you for your comment.

28. The FS fails to recognize the issue of connecting motorized trails into reasonable riding distances (up to 100 miles).

Commenter 1018

Response: Thank you for your comment. The recreation section in Chapter 3 of the FEIS describes the effects of implementing each of the alternatives, including a description of the motor vehicle travel opportunities within the various recreation settings across the ENF. This section, for instance, describes the differences in riding opportunities within the High Country, in the Ride and Play areas, and in other areas across the Forest. In discussion with OHV enthusiasts throughout this Travel Management project, OHV enthusiasts have described a wide variety of criteria that make for valued riding or travel opportunities, distance being one element. Motorcyclists voiced that they are looking for riding opportunities of about 100 miles per day; however, they also identified many routes that they enjoy that are significantly less than 100 miles, such as Hunter's trail (14E09; 10 miles long) and Lover's Leap trail (17E12; 1 mile long).

29. Very important and appreciated "Route Specific Non-Significant Forest Plan Amendments". This practice must be preserved in these alternatives, and actually could be expanded.

Commenter 152

**Response:** Thank you for your comment.

C-182 Appendix C

# SPECIFIC ROUTES COMMENTED ON

The following table displays the NFS roads and trails that were commented on and the status of those NFS roads and trails by alternative. The Key to the classes of vehicles allowed to use these NFS roads and trails in each of the alternatives is as follows:

<u>Text in Table</u>	Allowed Use
All Vehicles	NFS ML-2-5 Road: Open to Highway and Non-Highway Legal Vehicles. Note: only segments of the road may be open to Non-Highway Legal Vehicles.
Highway Vehicles	NFS ML-2-5 Road: Open to Highway Legal Vehicles
NFS Road: All Vehicles	NFS Road: Open to Highway and Non-Highway Legal Vehicles (Alternative A only)
Trail Vehicles	NFS 4WD Trail: Open to all Trail Vehicles
ATV and MC	NFS Trail: Open to ATVs and Motorcycles Only
Motorcycle	NFS Trail: Open to Motorcycles Only
Not Open	Not Open for Public Motor Vehicle Use

	# Comments Received on	Alternative B	Proposed Designation	Alternative C	Alternative D	Alternative E
ID	Route	Allowed Uses	Modified B	Allowed Uses	Allowed Uses	Allowed Uses
07N01	4	HWY Only	HWY Only	HWY Only	HWY Only	HWY Only
07N02	6	All Vehicles	All Vehicles	HWY Only	HWY Only	HWY Only
07N02F	3	Not Open	Not Open	Not Open	Not Open	Not Open
07N03	3	All Vehicles	All Vehicles	HWY Only	HWY Only	HWY Only
07N05	2	All Vehicles	All Vehicles	HWY Only	HWY Only	HWY Only
08N01	2	Not Open	Not Open	Not Open	Not Open	Not Open
08N01A	1	Not Open	Not Open	Not Open	Not Open	Not Open
08N02	2	Not Open	Not Open	Not Open	Not Open	Not Open
08N02A	33	Not Open	Not Open	Not Open	Not Open	Not Open
08N03	35	All Vehicles	All Vehicles	All Vehicles	All Vehicles	All Vehicles
08N03A	3	Not Open	Not Open	Not Open	Not Open	Not Open
08N03B	1	Not Open	Not Open	Not Open	Not Open	Not Open
08N03D	3	Not Open	Not Open	Not Open	Not Open	Not Open All Vehicles/Not
08N03F	5	All Vehicles	All Vehicles	All Vehicles	All Vehicles	Open
08N03FS	1	Not Open	Not Open	Not Open	Not Open	Not Open
		All Vehicles/Not		All Vehicles/Not	All Vehicles/Not	All Vehicles/Not
08N03FW	1	open	All Vehicles	Open	open	Open
08N03H	30	Not Open	All Vehicles	Not Open	Not Open	Not Open
08N05	3	HWY Only	Hwy Only	HWY Only	HWY Only	HWY Only
08N05B	1	All Vehicles	All Vehicles	HWY Only	Not Open	Not Open
08N05J	1	Not Open	Not Open	Not Open	Not Open	Not Open
08N05L	1	HWY Only	All Vehicles	HWY Only	HWY Only	Not Open
08N06	4	HWY Only	All Vehicles	HWY Only	Not Open	Not Open
08N06A	31	Not Open	All Vehicles	Not Open	Not Open	Not Open
08N07	6	Not Open	Not Open	Not Open	Not Open	Not Open
08N07A	3	Not Open	Not Open	Not Open	Not Open All Vehicles/Not	Not Open All Vehicles/Not
08N08	4	All Vehicles	All Vehicles	All Vehicles	Open	Open
08N08A	4	Not Open	Not Open	Not Open	Not Open	Not Open
08N09	3	Not Open	All Vehicles	Not Open	Not Open	Not Open
08N09B	1	Not Open	Not Open	Not Open	Not Open	Not Open
08N10	1	HWY Only	HWY Only	HWY Only	HWY Only	HWY Only
08N10A	1	Not Open	Not Open	Not Open	Not Open	Not Open
08N11	2	All Vehicles	HWY Only	HWY Only	HWY Only	HWY Only
08N12	2	All Vehicles	HWY Only	HWY Only	HWY Only	HWY Only
08N13	2	All Vehicles	All Vehicles	HWY Only	HWY Only	HWY Only
08N14	12	All Vehicles	Not Open	HWY Only	HWY Only	HWY Only
08N14A	3	Not Open	Not Open	Not Open	Not Open	Not Open
08N14B	1	All Vehicles	All Vehicles	HWY Only	Not Open	Not Open
08N14D	1	All Vehicles	All Vehicles	HWY Only	Not Open	Not Open
08N14G	2	Not Open	All Vehicles	Not Open	Not Open	Not Open
08N14H	1	Not Open	Not Open	Not Open	Not Open	Not Open
08N15	4	All Vehicles	HWY Only	HWY Only	HWY Only	HWY Only
08N15A	1	All Vehicles	All Vehicles	HWY Only	Not Open	Not Open
08N16	14	HWY Only	HWY Only	HWY Only	HWY Only	HWY Only
08N16A	2	All Vehicles	All Vehicles	HWY Only	HWY Only	HWY Only
08N16B	3	HWY Only	HWY Only	HWY Only	Not Open	Not Open
08N16C	3	Not Open	Not Open	Not Open	Not Open	Not Open
08N16D	2	HWY Only	HWY Only	HWY Only	Not Open	Not Open
08N16E	3	Not Open	Not Open	Not Open	Not Open	Not Open

	# Comments		Proposed			
	Received on	Alternative B	Designation	Alternative C	Alternative D	Alternative E
ID	Route	Allowed Uses	Modified B	Allowed Uses	Allowed Uses	Allowed Uses
08N17	15	HWY Only	HWY Only	HWY Only	HWY Only	HWY Only
				All Vehicles/Hwy	A 11 3 / 1 · 1	AH > / 1 · 1
08N18	15	All Vehicles	All Vehicles	Only	All Vehicles	All Vehicles
08N19	4	OHV Only	Not Open	Not Open	OHV Only	Not Open Not Open
08N19B	33	Not Open All Vehicles/Not	Not Open All Vehicles/Not	Not Open All Vehicles/Not	Not Open All Vehicles/not	All Vehicles/Not
08N20	11	open	Open	Open	open	Open
08N20C	1	All Vehicles	All Vehicles	All Vehicles	All Vehicles	All Vehicles
08N20F	2	HWY Only	HWY Only	HWY Only	HWY Only	HWY Only
08N20FE	1	HWY Only	All Vehicles	HWY Only	HWY Only	HWY Only
08N20J	1	Not Open	Not Open	Not Open	Not Open	Not Open
08N20K	3	Not Open	Not Open	Not Open	Not Open	Not Open
		All Vehicles/Not	·	All Vehicles/Not	All Vehicles/Not	All Vehicles/Not
08N21	6	open	All Vehicles	Open	Open	Open
08N21A	1	Not Open	Not Open	Not Open	Not Open	Not Open
08N21B	2	Not Open	All Vehicles	Not Open	Not Open	Not Open
08N22	1	All Vehicles	All Vehicles	All Vehicles	All Vehicles	All Vehicles
08N23	5	HWY Only	Hwy Only	HWY Only	HWY On;y	HWY Only
08N23A	2	HWY Only	All Vehicles	HWY Only	HWY Only	HWY Only
08N23B	1	HWY Only	All Vehicles	HWY Only	HWY Only	Not Open
08N23C	1	HWY Only	All Vehicles	HWY Only	HWY Only	HWY Only
08N23D	1	Not Open	Not Open	Not Open	Not Open	Not Open
08N24	2	All Vehicles	All Vehicles	HWY Only	Not Open	Not Open
08N24A	1	All Vehicles	All Vehicles	HWY Only	Not Open	Not Open
08N25	13	HWY Only	HWY Only	HWY Only	HWY Only	HWY Only
08N25B	6	Not Open	Not Open	Not Open	Not Open	Not Open
08N25C	2	HWY Only	HWY Only	HWY Only	HWY Only	HWY Only
08N26	1	HWY Only	All Vehicles	HWY Only	HWY Only	HWY Only
08N27	2	HWY Only	All Vehicles	HWY Only	HWY Only	HWY Only
08N28	6	HWY Only	All Vehicles	HWY Only	Not Open	Not Open
08N28B	3	HWY Only	All Vehicles	HWY Only	Not Open	Not Open
08N29	20	HWY Only	HWY Only	HWY Only	HWY Only	HWY Only
08N30	5	HWY Only	HWY Only	HWY Only	HWY Only	HWY Only
08N30B	5	HWY Only	All Vehicles	HWY Only	Not Open	Not Open
08N31	4	only	All Vehicles	HWY Only	Only	Only
08N31A	1	HWY Only	All Vehicles	HWY Only	Not Open	Not Open
08N31B	2	HWY Only	All Vehicles	HWY Only	HWY Only	HWY Only
08N32	8	All Vehicles	HWY Only	HWY Only	HWY Only	HWY Only
08N32A	1	Not Open	Not Open	Not Open	Not Open	Not Open
08N33	4	All Vehicles	All Vehicles	HWY Only	Not Open	Not Open
08N33A	3	Not Open	All Vehicles	Not Open	Not Open	Not Open
08N34	1	Not Open	Not Open	Not Open	Not Open	Not Open
08N35	4	All Vehicles	All Vehicles	HWY Only	Not Open	Not Open
08N35C	39	All Vehicles	All Vehicles	HWY Only	Not Open	Not Open
08N36	2	All Vehicles	All Vehicles	HWY Only	HWY Only	HWY Only
08N37	3	HWY Only	HWY Only	HWY Only	HWY Only	HWY Only
08N37A	3	HWY Only	All Vehicles	HWY Only	Not Open	Not Open
08N38	7	All Vehicles	HWY Only	HWY Only	HWY Only	HWY Only
08N38A	1	Not Open	All Vehicles	Not Open	Not Open	Not Open
08N38B	1	All Vehicles	All Vehicles	HWY Only	Not Open	Not Open
08N38E	3	All Vehicles	All Vehicles	HWY Only	Not Open	Not Open
				<u>, , , , , , , , , , , , , , , , , , , </u>		

	# Comments		Proposed			
	Received on	Alternative B	Designation	Alternative C	Alternative D	Alternative E
ID	Route	Allowed Uses	Modified B	Allowed Uses	Allowed Uses	Allowed Uses
08N39	1	HWY Only	HWY Only	HWY Only	HWY Only	HWY Only
08N42	4	HWY Only	HWY Only	HWY Only	HWY Only	HWY Only
08N42C	3	HWY Only	All Vehicles	HWY Only	Not Open	Not Open
		All Vehicles/Not		All Vehicles/Not	All Vehicles/Not	
08N43	8	open	All Vehicles	Open	Open	Not Open
08N43A	1	All Vehicles	All Vehicles	All Vehicles	All Vehicles	Not Open
08N43B	30	HWY Only	Not Open	HWY Only	HWY Only	Not Open
08N44	5	All Vehicles	All Vehicles	All Vehicles	HWY Only	HWY Only
08N44B	1	Not Open	Not Open	Not Open	Not Open	Not Open
08N44D	30	Not Open	Not Open	Not Open	Not Open	Not Open
08N45	3	HWY Only	HWY Only	HWY Only	HWY Only	HWY Only
001140	_	All Vehicles/Hwy	All Vehicles/Hwy	All Vehicles/Hwy	All Vehicles/Hwy	
08N46	5	only	Only	Only	Only	Only
08N46A	1	Not Open	Not Open	Not Open	Not Open	Not Open
08N46B	1	Not Open HWY Only/Not	Not Open	Not Open HWY Only/Not	Not Open HWY Only/Not	Not Open HWY Only/Not
08N47	5	open	HWY Only	Open	Open	Open
08N47A	2	HWY Only	All Vehicles	HWY Only	HWY Only	Not Open
08N48	3	All Vehicles	All Vehicles	All Vehicles	All Vehicles	All Vehicles
08N48A	1	All Vehicles	All Vehicles	All Vehicles	All Vehicles	All Vehicles
08N49	2	All Vehicles	All Vehicles	All Vehicles	All Vehicles	All Vehicles
08N50	4	HWY Only	HWY Only	HWY Only	HWY Only	HWY Only
08N50A	1	HWY Only	HWY Only	HWY Only	HWY Only	HWY Only
08N50B	1	HWY Only	HWY Only	HWY Only	HWY Only	HWY Only
08N50C	1	Not Open	Not Open	Not Open	Not Open	Not Open
08N50H	1	HWY Only	All Vehicles	HWY Only	HWY Only	HWY Only
08N52	4	Not Open	Not Open	Not Open	Not Open	Not Open
08N52A	2	All Vehicles	All Vehicles	HWY Only	Not Open	Not Open
08N53	1	Not Open	Not Open	Not Open	Not Open	Not Open
08N54	8	All Vehicles	All Vehicles	All Vehicles	All Vehicles	All Vehicles
08N54A	2	Not Open	Not Open	Not Open	Not Open	Not Open
08N54AW	12	Not Open	Not Open	Not Open	Not Open	Not Open
		HWY Only/Not	·	'	HWY Only/Not	HWY Only/Not
08N54B	1	open	HWY Only	Not Open	Open	Open
08N55	17	All Vehicles		All Vehicles	All Vehicles	All Vehicles
08N55D	3	OHV Only	OHV Only	OHV Only	OHV Only	Not Open
08N55E	1	Not Open	All Vehicles	Not Open	Not Open	Not Open
08N55F	1	All Vehicles	All Vehicles	All Vehicles	All Vehicles	All Vehicles
08N55G	39	Not Open	Not Open	Not Open	Not Open	Not Open
		0.0.0	01.01	01.11.4.0.1	0.0.4	Motorcycles
08N55J	22	OHV Only	OHV Only	OHV Only	OHV Only	Only
08N55K	22	HWY Only	Not Open	HWY Only	HWY Only	Not Open
08N56	14	All Vehicles	All Vehicles	All Vehicles	All Vehicles	All Vehicles
08N56A	1	Not Open	Not Open	Not Open	Not Open	Not Open
08N57	5	Not Open	Not Open	Not Open	Not Open	Not Open
08N57B	39	Not Open	Not Open	Not Open	Not Open	Not Open
08N57C	1	Not Open	Not Open	Not Open	Not Open	Not Open
08N57D	2	HWY Only	All Vehicles	HWY Only	HWY Only	HWY Only
08N58	7	All Vehicles	All Vehicles	All Vehicles	All Vehicles	All Vehicles
08N58A	1	Not Open	Not Open	Not Open	Not Open	Not Open
08N58B	21	Not Open	Not Open	Not Open	Not Open	Not Open
08N58C	1	HWY Only	All Vehicles	HWY Only	HWY Only	HWY Only

	# 0		B			
	# Comments	Alternative B	Proposed	Alternative C	Alternative D	Alternative F
ID.	Received on Route	Allowed Uses	Designation Modified B	Alternative C Allowed Uses	Allowed Uses	Alternative E Allowed Uses
ID						
08N58D	2	HWY Only	All Vehicles	HWY Only	HWY Only	HWY Only
08N59	1	Not Open	Not Open	Not Open	Not Open	Not Open
08N59A	1	Not Open	Not Open	Not Open	Not Open	Not Open
08N60	6	All Vehicles	All Vehicles	All Vehicles	All Vehicles	All Vehicles Motorcycles
08N60A	1	OHV Only	OHV Only	OHV Only	OHV Only	Only
08N60B	1	Not Open	Not Open	Not Open	Not Open	Not Open
08N60C	1	Not Open	Not Open	Not Open	Not Open	Not Open
08N60D	3	Not Open	Not Open	Not Open	Not Open	Not Open
	-	'			HWY Only/Not	HWY Only/Not
08N61	6	HWY Only	All Vehicles	HWY Only	Open	Open
08N61A	2	Not Open	Not Open	Not Open	Not Open	Not Open
08N61B	1	HWY Only	All Vehicles	Not Open	Not Open	Not Open
08N61D	2	Not Open	Not Open	Not Open	Not Open	Not Open
08N62	20	Not Open	HWY Only	Not Open	Not Open	Not Open
08N62A	2	Not Open	Not Open	Not Open	Not Open	Not Open
08N65	3	All Vehicles	All Vehicles	HWY Only	HWY Only	HWY Only
08N65B	1	Not Open	Not Open	Not Open	Not Open	Not Open
08N66	1	HWY Only	HWY Only	HWY Only	HWY Only	HWY Only
08N67	2	HWY Only	All Vehicles	HWY Only	HWY Only	HWY Only
08N67A	1	HWY Only	All Vehicles	HWY Only	HWY Only	HWY Only
08N68	3	Not Open	Not Open	Not Open	Not Open	Not Open
08N68A	1	Not Open	Not Open	Not Open	Not Open	Not Open
08N68B	1	Not Open	Not Open	Not Open	Not Open	Not Open
08N69	19	HWY Only	All Vehicles	HWY Only	Not Open	Not Open
08N69A	1	Not Open	Not Open	Not Open	Not Open	Not Open
08N70	4	HWY Only	HWY Only	HWY Only	HWY Only	HWY Only
08N70A	1	Not Open	Not Open	Not Open	Not Open	Not Open
08N70B	1	HWY Only	All Vehicles	HWY Only	Not Open	Not Open
08N71	17	All Vehicles	All Vehicles	HWY Only	HWY Only	HWY Only
08N71B	1	Not Open	All Vehicles	Not Open	Not Open	Not Open
08N72	2	All Vehicles	HWY Only	All Vehicles	HWY Only	HWY Only
08N73	5	HWY Only	All Vehicles	HWY Only	Not Open	Not Open
08N73A	1	HWY Only	Not Open	HWY Only	Not Open	Not Open
08N73C	1	Not Open	Not Open	Not Open	Not Open	Not Open
08N74	1	Not Open	Not Open	Not Open	Not Open	Not Open
08N75	3	Not Open	Not Open	Not Open	Not Open	Not Open
08N75A	1	Not Open	Not Open	Not Open	Not Open	Not Open
08N75B	1	Not Open	Not Open	Not Open	Not Open	Not Open
08N76	2	All Vehicles	All Vehicles	All Vehicles	All Vehicles	Not Open
08N78	4	Not Open	All Vehicles	Not Open	Not Open	Not Open
08N79	20	HWY Only	All Vehicles	HWY Only	HWY Only	Not Open
08N80	38	HWY Only	Not Open	Not Open	Not Open	Not Open
08N81	1	HWY Only	All Vehicles	HWY Only	Not Open	Not Open
08N82	3	HWY Only	HWY Only	HWY Only	Not Open	Not Open
08N82A	1	Not Open	Not Open	Not Open	Not Open	Not Open
08N83	2	HWY Only	All Vehicles	HWY Only	HWY Only	HWY Only
08N83C	1	HWY Only	All Vehicles	HWY Only	HWY Only	HWY Only
08N84	1	HWY Only	All Vehicles	HWY Only	HWY Only	HWY Only
08N85	3	Not Open	Not Open	Not Open	Not Open	Not Open
08N86	4	HWY Only	All Vehicles	HWY Only	Not Open	Not Open

ID   Route   Allowed Uses   Modified B   Allowed Uses   Allowed	
ID	
08N87         2         HWY Only         All Vehicles         HWY Only         HWY Only         HWY Only           08N90         1         Not Open         All Vehicles         All Vehi	rnative E
Not Open   All Vehicles	wed Uses
OBN91	
All Vehicles/Not Open Open Open Open Open Open Open Open	pen
09N01         6         open         Not Open         All Vehicles         Open         All Vehicles         All Vehicles         Open         Open         Open         Open         All Vehicles         Open         Open         Open         Open         Open         All Vehicles         All Vehicles         Open         Open         Open         All Vehicles         All Vehicles         Open	ehicles
09N01F         34         Not Open         All Vehicles	ehicles/Not
09N02         7         All Vehicles         A	
09N02A       2       All Vehicles       All Vehicles <th>•</th>	•
09N03         2         HWY Only         Not Open         HWY Only         HWY Only         Open           09N04         14         All Trail Vehicles         All Trail Vehicles         OHV Only         trail Vehicles / All Vehicles         Open           09N06         1         HWY Only         Not Open         Not O	ehicles
09N03         2         HWY Only         Not Open         HWY Only         HWY Only         Open           09N04         14         All Trail Vehicles         All Trail Vehicles         OHV Only         trail Vehicles         All Vehicles           09N06         1         HWY Only         Not Only         HWY Only         HWY Only         HWY Only         HWY Only         HWY Only         Not Only <th>ehicles</th>	ehicles
09N0414All Trail VehiclesAll Trail VehiclesOHV Onlytrail VehiclesOpen09N061HWY OnlyHWY OnlyHWY OnlyHWY OnlyHWY Only09N071HWY OnlyAll VehiclesHWY OnlyHWY OnlyNot Only09N081HWY OnlyAll VehiclesHWY OnlyHWY OnlyNot Only09N1024All VehiclesAll VehiclesHWY OnlyHWY OnlyHWY Only09N10A1Not OpenNot OpenNot OpenNot OpenNot OpenNot Open09N10B4Not OpenNot OpenNot OpenNot OpenNot OpenNot OpenNot Open09N10C2Not OpenNot OpenNot OpenNot OpenNot OpenNot OpenNot OpenNot Open09N10CW1Not OpenAll VehiclesNot OpenNot OpenNot OpenNot OpenNot OpenNot Open09N10B1All VehiclesAll VehiclesHWY OnlyNot OpenNot OpenNo	Only/Not ehicles/Not
09N061HWY OnlyHWY OnlyHWY OnlyHWY OnlyHWY Only09N071HWY OnlyAll VehiclesHWY OnlyHWY OnlyNot Only09N081HWY OnlyAll VehiclesHWY OnlyHWY OnlyNot Only09N1024All VehiclesAll VehiclesHWY OnlyHWY OnlyHWY Only09N10A1Not OpenNot OpenNot OpenNot OpenNot Open09N10B4Not OpenNot OpenNot OpenNot OpenNot Open09N10C2Not OpenNot OpenNot OpenNot OpenNot Open09N10CW1Not OpenNot OpenNot OpenNot OpenNot Open09N10D1Not OpenAll VehiclesNot OpenNot OpenNot Open09N10E1All VehiclesAll VehiclesHWY OnlyNot OpenNot Open09N10F1All VehiclesNot OpenNot OpenNot OpenNot Open09N10G1All VehiclesAll VehiclesNot OpenNot OpenNot Open09N10H1Not OpenAll VehiclesNot OpenNot OpenNot OpenNot Open	
09N071HWY OnlyAll VehiclesHWY OnlyHWY OnlyNot O09N081HWY OnlyAll VehiclesHWY OnlyHWY OnlyNot O09N1024All VehiclesAll VehiclesHWY OnlyHWY OnlyHWY09N10A1Not OpenNot OpenNot OpenNot OpenNot OpenNot Open09N10B4Not OpenNot OpenNot OpenNot OpenNot OpenNot Open09N10C2Not OpenNot OpenNot OpenNot OpenNot OpenNot Open09N10CW1Not OpenNot OpenNot OpenNot OpenNot OpenNot Open09N10D1Not OpenAll VehiclesNot OpenNot OpenNot OpenNot Open09N10E1All VehiclesAll VehiclesHWY OnlyNot OpenNot Open09N10F1All VehiclesAll VehiclesHWY OnlyNot OpenNot Open09N10G1All VehiclesAll VehiclesNot OpenNot OpenNot OpenNot Open09N10H1Not OpenAll VehiclesNot OpenNot OpenNot OpenNot Open	
09N081HWY OnlyAll VehiclesHWY OnlyHWY OnlyNot Open09N1024All VehiclesAll VehiclesHWY OnlyHWY OnlyHWY Only09N10A1Not OpenNot OpenNot OpenNot OpenNot Open09N10B4Not OpenNot OpenNot OpenNot OpenNot Open09N10C2Not OpenNot OpenNot OpenNot OpenNot Open09N10CW1Not OpenNot OpenNot OpenNot OpenNot Open09N10D1Not OpenAll VehiclesNot OpenNot OpenNot Open09N10F1All VehiclesAll VehiclesHWY OnlyNot OpenNot Open09N10G1All VehiclesAll VehiclesHWY OnlyNot OpenNot Open09N10H1Not OpenAll VehiclesNot OpenNot OpenNot OpenNot Open09N10K1Not OpenAll VehiclesNot OpenNot OpenNot OpenNot Open	
09N1024All VehiclesAll VehiclesHWY OnlyHWY OnlyHWY09N10A1Not OpenNot OpenNot OpenNot OpenNot Open09N10B4Not OpenNot OpenNot OpenNot OpenNot Open09N10C2Not OpenNot OpenNot OpenNot OpenNot Open09N10CW1Not OpenNot OpenNot OpenNot OpenNot Open09N10D1Not OpenAll VehiclesNot OpenNot OpenNot Open09N10E1All VehiclesAll VehiclesHWY OnlyNot OpenNot Open09N10F1All VehiclesNot OpenHWY OnlyNot OpenNot Open09N10G1All VehiclesAll VehiclesHWY OnlyNot OpenNot Open09N10H1Not OpenAll VehiclesNot OpenNot OpenNot Open09N10K1Not OpenAll VehiclesNot OpenNot OpenNot Open	
09N10A1Not OpenNot OpenNot OpenNot OpenNot Open09N10B4Not OpenNot OpenNot OpenNot OpenNot Open09N10C2Not OpenNot OpenNot OpenNot OpenNot Open09N10CW1Not OpenNot OpenNot OpenNot OpenNot Open09N10D1Not OpenAll VehiclesNot OpenNot OpenNot Open09N10E1All VehiclesAll VehiclesHWY OnlyNot OpenNot Open09N10F1All VehiclesNot OpenHWY OnlyNot OpenNot Open09N10G1All VehiclesAll VehiclesHWY OnlyNot OpenNot Open09N10H1Not OpenAll VehiclesNot OpenNot OpenNot Open09N10K1Not OpenAll VehiclesNot OpenNot OpenNot Open	
09N10B4Not OpenNot OpenNot OpenNot OpenNot Open09N10C2Not OpenNot OpenNot OpenNot OpenNot Open09N10CW1Not OpenNot OpenNot OpenNot OpenNot Open09N10D1Not OpenAll VehiclesNot OpenNot OpenNot Open09N10E1All VehiclesAll VehiclesHWY OnlyNot OpenNot Open09N10F1All VehiclesNot OpenHWY OnlyNot OpenNot Open09N10G1All VehiclesAll VehiclesHWY OnlyNot OpenNot Open09N10H1Not OpenAll VehiclesNot OpenNot OpenNot Open09N10K1Not OpenAll VehiclesNot OpenNot OpenNot Open	
09N10C2Not OpenNot OpenNot OpenNot OpenNot Open09N10CW1Not OpenNot OpenNot OpenNot OpenNot Open09N10D1Not OpenAll VehiclesNot OpenNot OpenNot Open09N10E1All VehiclesAll VehiclesHWY OnlyNot OpenNot Open09N10F1All VehiclesNot OpenHWY OnlyNot OpenNot Open09N10G1All VehiclesAll VehiclesHWY OnlyNot OpenNot Open09N10H1Not OpenAll VehiclesNot OpenNot OpenNot Open09N10K1Not OpenAll VehiclesNot OpenNot OpenNot Open	•
09N10CW1Not OpenNot Open	•
09N10D1Not OpenAll VehiclesNot OpenNot OpenNot Open09N10E1All VehiclesAll VehiclesHWY OnlyNot OpenNot Open09N10F1All VehiclesNot OpenHWY OnlyNot OpenNot Open09N10G1All VehiclesAll VehiclesHWY OnlyNot OpenNot Open09N10H1Not OpenAll VehiclesNot OpenNot OpenNot Open09N10K1Not OpenAll VehiclesNot OpenNot OpenNot Open	•
09N10E1All VehiclesAll VehiclesHWY OnlyNot OpenNot Open09N10F1All VehiclesNot OpenHWY OnlyNot OpenNot Open09N10G1All VehiclesAll VehiclesHWY OnlyNot OpenNot Open09N10H1Not OpenAll VehiclesNot OpenNot OpenNot Open09N10K1Not OpenAll VehiclesNot OpenNot OpenNot Open	•
09N10F1All VehiclesNot OpenHWY OnlyNot OpenNot Open09N10G1All VehiclesAll VehiclesHWY OnlyNot OpenNot Open09N10H1Not OpenAll VehiclesNot OpenNot OpenNot Open09N10K1Not OpenAll VehiclesNot OpenNot OpenNot Open	•
09N10G1All VehiclesAll VehiclesHWY OnlyNot OpenNot Open09N10H1Not OpenAll VehiclesNot OpenNot OpenNot Open09N10K1Not OpenAll VehiclesNot OpenNot OpenNot Open	
09N10H1Not OpenAll VehiclesNot OpenNot OpenNot Open09N10K1Not OpenAll VehiclesNot OpenNot OpenNot Open	•
09N10K 1 Not Open All Vehicles Not Open Not Open Not O	
All Vehicles/Not All Vehicles/Not HWY Only/Not HWY Only/Not HWY	Only/Not
09N11 5 open Open Open Open	1
09N12 31 All Vehicles Not Open HWY Only HWY Only Not O	pen
09N12A 6 Not Open Not Open Not Open Not Open Not Open	pen
09N12AN 3 Not Open Not Open Not Open Not Open Not Open	pen
09N12B7Not OpenNot OpenNot OpenNot Open	pen
09N12C 3 Not Open Not Open Not Open Not Open Not Open	pen
09N12D 3 Not Open Not Open Not Open Not Open Not Open	pen
09N12E 1 Not Open Not Open Not Open Not Open Not Open	
All Vehicles/Hwy All Ve	-
09N13     3     only     All Vehicles     Only     only     Only       All Vehicles/Hwy     All Vehicles/Hwy     All Vehicles/Hwy     All Vehicles/Hwy	
All Vehicles/Hwy All Vehicles/Hwy Only HWY Only Only HWY Only Only	ehicles/Hwy
09N14A 20 HWY Only All Vehicles HWY Only Not Open Not O	)nen
09N14B 1 All Vehicles Not Open	•
09N14C 2 Not Open Not	•
09N14D 4 Not Open All Vehicles Not Open	•
09N14E 11 Not Open Not Open Not Open All Vehicles Not O	•
	ehicles
All Vehicles All V	01110103
09N14K 1 All Vehicles Not Open Open Not Open Not O	pen
09N14L 2 Not Open Not Open Not Open All Vehicles Not O	•
All Vehicles/Not All Vehicles/Not	•
09N14M3All VehiclesNot OpenOpenOpenNot O	Open
09N14W 1 All Vehicles All Vehicles HWY Only HWY Only Not O	
09N15 8 HWY Only All Vehicles HWY Only HWY Only Not O	•

ID.	# Comments Received on Route	Alternative B	Proposed Designation Modified B	Alternative C	Alternative D	Alternative E
ID						
09N15A	1	HWY Only	All Vehicles	HWY Only	HWY Only	Not Open
09N15B	1	HWY Only	Not Open	HWY Only	All Vehicles	Not Open
09N16	4	All Vehicles	All Vehicles	All Vehicles	Not Open	All Vehicles
09N17	40	HWY Only	HWY Only	HWY Only	HWY Only	HWY Only
09N17A	3	All Vehicles	All Vehicles	HWY Only	Not Open	HWY Only
09N17B	39	Not Open	All Vehicles	Not Open	Not Open	Not Open
09N17C	4	Not Open	All Vehicles	Not Open	Not Open	Not Open
09N17E	4	Not Open	Not Open	Not Open	Not Open	Not Open
09N17F	2	Not Open	Not Open	Not Open	Not Open	Not Open
09N17H	3	All Vehicles	All Vehicles	HWY Only	Not Open	HWY Only
09N17J	2	All Vehicles	All Vehicles	HWY Only	Not Open	Not Open
09N17K	2	Not Open	All Vehicles	Not Open	Not Open	Not Open
09N17L	4	Not Open	All Vehicles	Not Open	Not Open	Not Open
09N17M	3	HWY Only	Not Open	HWY Only	Not Open	Not Open
09N17MS	3	Not Open	All Vehicles	Not Open	Not Open	Not Open
09N17P	2	Not Open	Not Open	Not Open	HWY Only	Not Open
09N17Q	3	All Vehicles	All Vehicles	HWY Only	Not Open	HWY Only
09N17S	2	All Vehicles	All Vehicles	All Vehicles	Not Open	HWY Only
09N17T	1	Not Open	All Vehicles	Not Open	Not Open	Not Open
09N17W	2	All Vehicles	All Vehicles	HWY Only	Not Open	HWY Only
09N20	9	All Vehicles	All Vehicles	HWY Only	Not Open	HWY Only
09N20B	4	Not Open	Not Open	Not Open	Not Open	Not Open
09N22	3	HWY Only	HWY Only	HWY Only	HWY Only	HWY Only
09N22B	1	HWY Only	All Vehicles	HWY Only	Not Open	HWY Only
09N22E	2	Not Open	Not Open	Not Open	Not Open	Not Open
09N23	6	Not Open	All Vehicles	Not Open	Not Open	Not Open
09N23A	1	Not Open	All Vehicles	Not Open	All Vehicles	Not Open
		All Vehicles/Not	All Vehicles/Not			All Vehicles/Not
09N24	2	open	Open	Not Open	Not Open	Open
09N24B	2	Not Open	Not Open	Not Open	All Vehicles	Not Open
09N25	12	All Vehicles	All Vehicles	All Vehicles	Not Open	HWY Only
09N25B	3	All Vehicles	All Vehicles	All Vehicles	Not Open	Not Open
09N25D	3	Not Open	All Vehicles	Not Open	HWY Only	Not Open
	_	All Vehicles/Not		All Vehicles/Not		HWY Only/Not
09N25E	1	open	All Vehicles	Open	Not Open	Open
09N25G	3	All Vehicles	All Vehicles	All Vehicles	Not Open	HWY Only
09N27	2	Not Open	Not Open	Not Open	Not Open	Not Open
09N27A	2	Not Open	Not Open	Not Open	Not Open	Not Open
09N30	8	All Vehicles	HWY Only	All Vehicles	HWY Only	All Vehicles/Not Open
09N30A	3	HWY Only	All Vehicles	HWY Only	Not Open	Not Open
09N30J	2	HWY Only	All Vehicles	HWY Only	HWY Only	HWY Only
09N30JW	1	HWY Only	All Vehicles	HWY Only	Not Open	HWY Only
09N32	3	All Vehicles	All Vehicles	All Vehicles	All Vehicles	All Vehicles
09N33	1	All Vehicles	All Vehicles	All Vehicles	All Vehicles	All Vehicles
09N34	5	All Vehicles	All Vehicles	All Vehicles	All Vehicles	All Vehicles
09N34B	2	All Vehicles	Not Open	All Vehicles	All Vehicles	All Vehicles
09N34C	3	All Vehicles	All Vehicles	All Vehicles	Not Open	All Vehicles
09N36	4	HWY Only	All Vehicles	HWY Only	All Vehicles	HWY Only
09N37	5	All Vehicles	Not Open	All Vehicles	Not Open	Not Open
09N37B	4	Not Open	Not Open	Not Open	All Vehicles	Not Open

	# 60		Duamanad			
	# Comments	Altamatica D	Proposed	Altano ativa C	Altanoativa D	Altanoatius E
ID	Received on Route	Alternative B Allowed Uses	Designation Modified B	Alternative C Allowed Uses	Alternative D Allowed Uses	Alternative E Allowed Uses
						All Vehicles
09N40	3	All Vehicles	HWY Only All Vehicles	All Vehicles	All Vehicles	
09N40A	2	All Vehicles		HWY Only	HWY Only	Not Open
09N40B	1	HWY Only	All Vehicles	HWY Only	HWY Only	HWY Only
09N41	4	All Vehicles	All Vehicles	HWY Only	HWY Only	HWY Only
09N41A	3	All Vehicles	All Vehicles	HWY Only	HWY Only	HWY Only
09N42	5	All Vehicles	All Vehicles	HWY Only	HWY Only	HWY Only
09N43	2	Not Open	Not Open	Not Open	All Vehicles	Not Open
09N45	26	All Vehicles	All Vehicles	All Vehicles	Not Open	All Vehicles
09N45D	27	Not Open	Not Open	Not Open	Not Open	Not Open
09N46	4	HWY Only	HWY Only	HWY Only	HWY Only	HWY Only
09N46J	1	HWY Only	All Vehicles	HWY Only	All Vehicles	HWY Only
09N47	2	All Vehicles	All Vehicles	HWY Only	All Vehicles	All Vehicles
09N49	7	All Vehicles	All Vehicles	All Vehicles	Not Open	All Vehicles
0011400		All Vehicles/Not	All Vehicles/Not	All Vehicles/Not	All Vehicles/Not	Nat Oak
09N49B	11	open	Open	Open	Open	Not Open All Vehicles/Not
09N50	4	All Vehicles	All Vehicles	All Vehicles	Not Open	Open
09N50B	30	Not Open	All Vehicles	Not Open	Not Open	Not Open
09N51	7	All Vehicles	All Vehicles	HWY Only	Not Open	HWY Only
09N51A	2	Not Open	Not Open	Not Open	Not Open	Not Open
09N52	3	All Vehicles	Not Open	All Vehicles	Not Open	Not Open
09N52A	3	All Vehicles	All Vehicles	All Vehicles	All Vehicles	Not Open
09N53	2	All Vehicles	All Vehicles	All Vehicles	HWY Only	All Vehicles
						HWY Only/Not
09N54	1	HWY Only	All Vehicles	HWY Only	All Vehicles	Open
		All	All	All	NA . ( l	
CONIECD	4	Vehicles/Motorcy		Vehicles/Motorcy	Motorcycles	Not Onen
09N55D	1	cles Only All Vehicles	cles Only All Vehicles	cles Only	Only/All Vehicles All Vehicles	All Vehicles
09N56	3	HWY Only	All Vehicles	All Vehicles HWY Only	All Vehicles	HWY Only
09N59	1	All Vehicles/Not	All Vehicles/Not	All Vehicles/Not	All verticles	All Vehicles/Not
09N60	1	open	Open	Open	Not Open	Open
031100	'	HWY Only/Not	All Vehicles/Hwy	HWY Only/Not	Hwy Only/Not	HWY Only/Not
09N61	2	open	Only	Open	Open	Open
09N62	1	HWY Only	All Vehicles	HWY Only	Not Open	Not Open
				Motorcycles		Motorcycles
09N64	4	Motorcycles Only	•	Only	Not Open	Only
09N64B	20	Not Open	Not Open	Not Open	Not Open	Not Open
09N67	2	All Vehicles	All Vehicles	All Vehicles	Not Open	All Vehicles
OONEO	4	All Vehicles/Hwy	HWY Only	HIMY Only	LIM/V Only	HWY Only
09N68	1	only Not Open	· ·	HWY Only	HWY Only	•
09N72 09N77	39	All Vehicles	All Vehicles All Vehicles	Not Open HWY Only	Not Open Not Open	Not Open HWY Only
	5		HWY Only	,		Not Open
09N77A	1	Not Open	•	Not Open	All Vehicles	HWY Only
09N79	7	All Vehicles	All Vehicles	HWY Only	Not Open	,
09N79A	4	Not Open All Trail	All Vehicles All Trail	Not Open	All Vehicles All Trail	Not Open
		Vehicles/Not	Vehicles/Not	OHV Only/Not	Vehicles/Not	
09N82	16	Open	Open	Open	Open	Not Open
	1	- 1	- 1: - : :	- 1		All Trail
						Vehicles/Not
09N83	39	All Trail Vehicles	All Trail Vehicles	OHV Only	HWY Only	Open
09N84	5	HWY Only	All Vehicles	HWY Only	Not Open	HWY Only

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	# Comments		Proposed			
	Received on	Alternative B	3	Alternative C	Alternative D	Alternative E
ID	Route	Allowed Uses	Modified B	Allowed Uses	Allowed Uses	Allowed Uses
09N88	2	Not Open	Not Open	Not Open	Not Open	Not Open
00104		All Vehicles	Not Open	All Vehicles	All Vehicles	All Vehicles/Not
09N91 09N94	1	Not Open	Not Open Not Open	Not Open	All Vehicles	Open Not Open
U9N94	<u>'</u>	All Vehicles/Not	All Vehicles/Not	All Vehicles/Not	All VehiclesNot	Not Open
09N95	1	open	Open	Open	Open	Not Open
09N95B	1	All Vehicles	All Vehicles	All Vehicles	All Vehicles	Not Open
		All Vehicles/Not	All Vehicles/Not			All Vehicles/Not
09N96	15	open	Open	All Vehicles	Not Open	Open
09N96A	2	All Vehicles	All Vehicles	Not Open	Not Open	Not Open
09N96B	19	Not Open	All Vehicles	Not Open	Not Open	Not Open
09NY21	2	HWY Only	All Vehicles	HWY Only	Not Open	Not Open
09NY26	1	HWY Only	All Vehicles	HWY Only	Not Open	Not Open
09NY27	1	Not Open	Not Open	Not Open	Not Open	Not Open
09NY27W	1	Not Open	Not Open	Not Open	Not Open	Not Open
09NY30	1	Not Open	Not Open	Not Open	All Vehicles	Not Open
09NY31	1	All Vehicles Not Open	Not Open Not Open	All Vehicles Not Open	Not Open HWY Only	Not Open Not Open
09NY31D	2	HWY Only/Not	пот Ореп	HWY Only/Not	HVV I Offig	HWY Only/Not
09NY32	2	open	All Vehicles	Open	Not Open	Open
09NY32A	7	Not Open	Not Open	Not Open	Not Open	Not Open
09NY32B	6	Not Open	Not Open	Not Open	Not Open	Not Open
	-		·	Motorcycles	'	
09NY35	5	Motorcycles Only		Only	Motorcycles Only	Not Open
	_	Motorcycles	Motorcycles	Motorcycles	Hwy OnlyNot	N O
09NY36	5	Only/Not Open	Only/Not Open	Only/Not Open	Open	Not Open
09NY40	9	All Vehicles	All Vehicles	All Vehicles	Not Open	All Vehicles
09NY41	2 2	Not Open All Vehicles	Not Open All Vehicles	Not Open All Vehicles	Not Open	Not Open Not Open
09NY43	2	Non-Motorized	Non-Motorized	Non-Motorized	Not Open Non-Motorized	Not Open Non-Motorized
10E04	10	Trail	Trail	Trail	Trail	Trail
.0201		Non-Motorized	Non-Motorized	Non-Motorized	Non-Motorized	Non-Motorized
10E06	10	Trail	Trail	Trail	Trail	Trail
10N02A	3	Not Open	Not Open	Not Open	HWY Only	Not Open
						HWY Only/Not
10N03	13	HWY Only	All Vehicles	HWY Only	All Vehicles	Open
10N04	4	All Vehicles	All Vehicles	All Vehicles	HWY Only	All Vehicles/Not Open
10N05	1	HWY Only	HWY Only	HWY Only	HWY Only	HWY Only
10N06	1	All Vehicles	All Vehicles	HWY Only	Not Open	HWY Only
10N07	1	HWY Only	HWY Only	HWY Only	HWY Only	HWY Only
10N07A	3	HWY Only	HWY Only	HWY Only	HWY Only	HWY Only
10N08	2	All Vehicles	All Vehicles	All Vehicles	Not Open	Not Open
10N08A	2	Not Open	All Vehicles	Not Open	Not Open	Not Open
10N08B	5	All Vehicles	All Vehicles	All Vehicles	Not Open	Not Open
10N09	2	All Vehicles	Not Open	All Vehicles	Not Open	Not Open
10N09BW	4	Not Open	Not Open	Not Open	Not Open	Not Open
10N10	2	Not Open	Not Open	Not Open	Not Open	Not Open
10N11	3	HWY Only	HWY Only	HWY Only	HWY Only	HWY Only
10N13A	3	Not Open	Not Open	Not Open	Not Open	Not Open
10N13B	2	Not Open	Not Open	Not Open	Not Open	Not Open
10N14B	1	All Trail Vehicles	All Trail Vehicles	OHV Only	Not Open	Not Open
10N14E	12	Not Open	Not Open	Not Open	Not Open	Not Open

	# Comments		Proposed			
	Received on	Alternative B	Designation	Alternative C	Alternative D	Alternative E
ID	Route	Allowed Uses	Modified B	Allowed Uses	Allowed Uses	Allowed Uses
10N14F	1	Not Open	Not Open	Not Open	HWY Only	Not Open
10N14G	1	All Vehicles	All Vehicles	HWY Only	Not Open	Not Open
10N15	1	All Vehicles	Not Open	All Vehicles	Not Open	Not Open
10N15A	3	All Vehicles	Not Open	All Vehicles	All Vehicles	Not Open
		All Vehicles/Hwy			HWY Only/Not	All Vehicles/Hwy
10N16	1	only	All Vehicles	HWY Only	Open	Only
10N16A	1	Not Open	All Vehicles	Not Open	HWY Only	Not Open
10N16B	2	HWY Only	All Vehicles	HWY Only	HWY Only	HWY Only/Not Open
TOINTOB	2	Tivvi Only	All Verlicles	Tivvi Only	11001 Offing	HWY Only/Not
10N16BA	2	HWY Only	All Vehicles	HWY Only	HWY Only	Open
10N21A	26	All Trail Vehicles	All Trail Vehicles	OHV Only	All Vehicles	All Trail Vehicles
				,		All Vehicles/Not
10N22	2	All Vehicles	All Vehicles	All Vehicles	Not Open	Open
		All Vehicles/Not	All Vehicles/Not	All Vehicles/Not		
10N26B	1	open	Open	Open	Not Open	Not Open
10N26C	1	All Vehicles	All Vehicles	All Vehicles	All Vehicles	Not Open
10N27A	1	Not Open	Not Open	Not Open	Not Open	Not Open
10N28D	2	Not Open	All Vehicles	Not Open	Not Open	Not Open
10N32B	6	All Vehicles	All Vehicles	All Vehicles	All Vehicles	Not Open
10N33	2	All Vehicles	All Vehicles	All Vehicles	Not Open	All Vehicles
40125	7	All Vehicles/Not	Not Open	All Vehicles/Not Open	Not Open	All Vehicles/Not
10N35 10N35B	7	open All Vehicles	All Vehicles	All Vehicles	Not Open	Open Not Open
10N36	29	All Vehicles	All Vehicles	All Vehicles	Not Open Not Open	Not Open
10N36 10N37	1		HWY Only	HWY Only	HWY Only	HWY Only
10N37 10N38	1	HWY Only All Vehicles	All Vehicles	All Vehicles	Not Open	Not Open
10N38B	1	Not Open	Not Open	Not Open	Not Open	Not Open
10N38C	1	Not Open	Not Open	Not Open	All Vehicles	Not Open
10N39	1	All Vehicles	All Vehicles	All Vehicles	Not Open	All Vehicles
10N39A	3	Not Open	Not Open	Not Open	Not Open	Not Open
10N39A	2	Not Open	Not Open	Not Open	Not Open	Not Open
10N39C	1	Not Open	Not Open	Not Open	Not Open	Not Open
10N39D	1	All Vehicles	All Vehicles	All Vehicles	Not Open	Not Open
10N39E	4	All Vehicles	All Vehicles	All Vehicles	Not Open	Not Open
10N39F	1	All Vehicles	All Vehicles	All Vehicles	All Vehicles	Not Open
10N40	1	All Vehicles	All Vehicles	All Vehicles	Not Open	All Vehicles
10N40A	1	Not Open	Not Open	Not Open	Not Open	Not Open
10N40B	2	Not Open	Not Open	Not Open	Not Open	Not Open
10N40C	1	HWY Only	All Vehicles	HWY Only	Not Open	Not Open
10N40D	1	Not Open	HWY Only	Not Open	Not Open	Not Open
10N40DN	1	Not Open	Not Open	Not Open	Not Open	Not Open
10N40E	1	Not Open	All Vehicles	Not Open	Not Open	Not Open
10N40P	2	Not Open	Not Open	Not Open	Not Open	Not Open
10N40Q	3	HWY Only	Not Open	HWY Only	Not Open	Not Open
10N40S	3	Not Open	Not Open	Not Open	Not Open	Not Open
10N41A	1	Not Open	Not Open	Not Open	Not Open	Not Open
10N42A	7	HWY Only	All Vehicles	HWY Only	HWY Only	Not Open
10N45B	1	Not Open	Not Open	Not Open	All Vehicles	Not Open
.011-1015	<del>'</del>	All Vehicles/Hwy		All Vehicles/Hwy	HWY Only/Not	All Vehicles/Hwy
10N46	1	only	HWY Only	Only	Open	Only
10N46D	1	Not Open	Not Open	Not Open	Not Open	Not Open
	<u> </u>			1		1

	# Comments		Proposed			
	Received on	Alternative B	Designation	Alternative C	Alternative D	Alternative E
ID	Route	Allowed Uses	Modified B	Allowed Uses	Allowed Uses	Allowed Uses
10N46H	2	All Vehicles	Not Open	HWY Only	Not Open	Not Open
10N46J	2	All Vehicles	All Vehicles	HWY Only	Not Open	Not Open
10N46P	1	Not Open	Not Open	Not Open	Not Open	Not Open
10N47A	9	All Vehicles	All Vehicles	All Vehicles	Not Open	Not Open
10N47B	3	All Vehicles	All Vehicles	All Vehicles	Not Open	Not Open
10N47C	40	All Vehicles	All Vehicles	All Vehicles	Not Open	Not Open
10N50C	3	HWY Only	All Vehicles	HWY Only	Not Open	Not Open
10N50D	2	HWY Only	HWY Only	HWY Only	HWY Only	HWY Only
10N50J	3	Not Open	Not Open	Not Open	Not Open	Not Open
10N50N	6	Not Open	Not Open	Not Open	Not Open	Not Open
10N50P	4	Not Open	Not Open	Not Open	Not Open	Not Open
10N50R	2	Not Open	All Vehicles	Not Open	Not Open	Not Open
10N50S	1	Not Open	Not Open	Not Open	HWY Only	Not Open
10N50U	1	Not Open	Not Open	Not Open	Not Open	Not Open
10N50V	1	HWY Only	HWY Only	HWY Only	HWY Only	HWY Only
10N51A	2	Not Open	Not Open	Not Open	Not Open	Not Open
10N51AN	2	Not Open	Not Open	Not Open	Not Open	Not Open
10N51C	5	Not Open	Not Open	Not Open	Not Open	Not Open
10N51D	3	Not Open	Not Open	Not Open	Not Open	Not Open
10N51F	1	Not Open	Not Open	Not Open	Not Open	Not Open
10N52A	1	Not Open	All Vehicles	Not Open	Not Open	Not Open
10N55J	1	Not Open	Not Open	Not Open	Not Open	Not Open
10N55L	9	Not Open	Not Open	Not Open	Not Open	Not Open
10N55LS	9	Not Open	Not Open	Not Open	Not Open	Not Open
10N55P	1	HWY Only	HWY Only	HWY Only	HWY Only	HWY Only
10N55V	1	Not Open	Not Open	Not Open	Not Open	Not Open
10N56	1	Not Open	Not Open	Not Open	HWY Only	Not Open
10N57	3	HWY Only	HWY Only	HWY Only	Not Open	HWY Only
10N57A	1	Not Open	Not Open	Not Open	Not Open	Not Open
10N60	13	All Vehicles	Not Open	HWY Only	Not Open	Not Open
10N62	1	All Vehicles	All Vehicles	All Vehicles	Not Open	Not Open
10N64A	1	Not Open	Not Open	Not Open	HWY Only	Not Open
10N64W	1	HWY Only	HWY Only	HWY Only	HWY Only	HWY Only
10N65B	5	Not Open	Not Open	Not Open	Not Open	Not Open
10N66B	3	Not Open	Not Open	Not Open	HWY Only	Not Open
10N67	3	HWY Only	All Vehicles	HWY Only	Not Open	HWY Only
10N72	7	Not Open	Not Open	Not Open	Not Open	Not Open
10N72C	1	Not Open	Not Open	Not Open	Not Open	Not Open
10N73	1	Not Open	Not Open	Not Open	Not Open	Not Open
10N75	2	All Vehicles	All Vehicles	All Vehicles	Not Open	All Vehicles
10N75A	1	Not Open	Not Open	Not Open	Not Open	Not Open
10N75C	1	Not Open	Not Open	Not Open	Not Open	Not Open
10N82A	2	Not Open	Not Open	Not Open	Not Open	Not Open
10N83G	1	Not Open	Not Open	Not Open	Not Open	Not Open
10N83H	1	Not Open	Not Open	Not Open	HWY Only	Not Open
10N83NE	1	Not Open	Not Open	Not Open	Motorcycles Only	Not Open
	_	Motorcycles	Motorcycles	Motorcycles	N . C	N . 0
10N83P	1	Only/Not Open	Only/Not Open	Only/Not Open	Not Open	Not Open
10N91E	1	All Vehicles	All Vehicles	All Vehicles	Not Open	Not Open
10N93J	1	Not Open	Not Open	Not Open	HWY Only	Not Open
10NY03	6	All Vehicles	Not Open	All Vehicles	Not Open	Not Open

	# 60		Businessed			
	# Comments	Altana attana D	Proposed	A 14 15 O	Altana attana D	A1(
	Received on	Alternative B	Designation	Alternative C	Alternative D	Alternative E
ID	Route	Allowed Uses	Modified B	Allowed Uses	Allowed Uses	Allowed Uses
10NY03A	3	Not Open				
10NY04	1	All Vehicles	All Vehicles	All Vehicles	Not Open	Not Open
10NY04A	1	Not Open				
10NY04B	2	Not Open				
10NY04C	2	Not Open				
10NY04D	1	Not Open	Not Open	Not Open	All Vehicles	Not Open
10NY04E	1	All Vehicles	All Vehicles	All Vehicles	Not Open	Not Open
10NY06	1	All Vehicles	All Vehicles	All Vehicles	Not Open	Not Open
10NY06B	1	All Vehicles	All Vehicles	All Vehicles	Not Open	Not Open
10NY07	1	All Vehicles	All Vehicles	All Vehicles	Not Open	Not Open
10NY07A	4	Not Open				
10NY08	4	Not Open				
10NY08A	1	Not Open				
10NY08G	2	Not Open	Not Open	Not Open	HWY Only	Not Open
10NY10A	6	Not Open				
10NY11B	2	Not Open	Not Open	Not Open	All Vehicles	Not Open
		All Vehicles/Not	All Vehicles/Not	All Vehicles/Not		All Vehicles/Not
10NY13	9	Open	Open	Open	Not Open	Open
10NY14	3	Not Open				
10NY16	7	Not Open	All Vehicles	Not Open	Not Open	Not Open
10NY18	2	Not Open				
10NY19	39	Not Open				
10NY22	2	Not Open				
10NY22A	2	Not Open				
10NY23	2	HWY Only	Not Open	HWY Only	HWY Only	HWY Only
10NY24	38	Not Open				
10NY24A	38	Not Open				
10NY25	2	Not Open				
10NY25A	4	Not Open				
10NY26	3	All Vehicles	All Vehicles	All Vehicles	Not Open	Not Open
10NY26A	2	All Vehicles	All Vehicles	All Vehicles	Not Open	Not Open
10NY27	3	Not Open				
10NY27A	3	Not Open				
10NY27B	2	Not Open				
10NY27C	13	Not Open				
10NY28	1	HWY Only				
10NY29	1	Not Open				
10NY30	1	Not Open	All Vehicles	Not Open	Not Open	Not Open
10NY32	4	Not Open				
					Non-Motorized	
10NY33	4	Not Open	Not Open	Not Open	Trail	Not Open
		Non-Motorized	Non-Motorized	Non-Motorized	Non-Motorized	Non-Motorized
11E03	2	Trail	Trail	Trail	Trail	Trail
11506		Non-Motorized Trail	Non-Motorized Trail	Non-Motorized Trail	Non-Motorized Trail	Non-Motorized Trail
11E06	2	Non-Motorized	Non-Motorized	Non-Motorized	Hall	Non-Motorized
11E46	1	Trail	Trail	Trail	Not Open	Trail
11N01	1	HWY Only	All Vehicles	HWY Only	Not Open	Not Open
11N02	1	Not Open	All Vehicles	Not Open	Not Open	Not Open
11N02A	4	Not Open	All Vehicles	Not Open	Not Open	Not Open
11N02W	1	Not Open	All Vehicles	Not Open	Not Open	Not Open
11N02VV	4	Not Open				
LINUS	4	Livor Obell	HOLOPEII	Hor Obell	Mot Open	Hor Obell

	# Cammanta		Businessed			
	# Comments	Alternative B	Proposed	Altamative	Alternative	Alternative
	Received on	Alternative B Allowed Uses	Designation Modified B	Alternative C Allowed Uses	Alternative D	Alternative E Allowed Uses
ID	Route				Allowed Uses	
11N04	1	Not Open	Not Open	Not Open	Not Open	Not Open
11N04B	8	Not Open	Not Open	Not Open	Not Open	Not Open
11N06	3	HWY Only	HWY Only	HWY Only	HWY Only	HWY Only
11N06A	7	HWY Only	HWY Only	HWY Only	HWY Only	HWY Only
11N08B	1	Not Open	Not Open	Not Open	Not Open	Not Open
11N08D	1	Not Open	Not Open	Not Open	HWY Only	Not Open
11N10	2	HWY Only	HWY Only	HWY Only	HWY Only	HWY Only
11N18C	20	All Vehicles	All Vehicles	All Vehicles	Not Open	Not Open
11N19A	2	Not Open	Not Open	Not Open	HWY Only	Not Open
11N20A	1	HWY Only	HWY Only	HWY Only	HWY Only	HWY Only
11N21	5	HWY Only	Not Open	HWY Only	Not Open	Not Open
44100	F	All Mobieles	All Vahiolog	HWY Only/Not	Not Open	Not Open
11N22	5	All Vehicles HWY Only	All Vehicles HWY Only	Open HWY Only	Not Open HWY Only	Not Open HWY Only
11N23 11N23J	5	,	Not Open	Not Open	,	,
11N23J 11N23K	<u>2</u> 1	Not Open HWY Only	Not Open	HWY Only	Not Open Not Open	Not Open Not Open
11N23K 11N23M	1	HWY Only	All Vehicles	HWY Only	Not Open	Not Open
TTNZ3W	ı	HVV1 Offig	All Vehicles/Not	HVV1 Offig	Not Open	Not Ореп
11N26A	1	Not Open	Open	Not Open	Not Open	Not Open
11N26CN	1	Not Open	Not Open	Not Open	Not Open	Not Open
	•		All Vehicles/Not		HWY Only/Not	
11N28	11	HWY Only	Open	HWY Only	Op	HWY Only
11N29A	1	All Vehicles	Not Open	All Vehicles	Not Open	Not Open
11N35B	1	All Vehicles	Not Open	All Vehicles	Not Open	Not Open
				HWY Only/Not		
11N36	22	All Vehicles	All Vehicles	Open	Not Open	Not Open
11N37B	1	HWY Only	All Vehicles	HWY Only	HWY Only	Not Open
11N37D	1	Not Open	Not Open	Not Open	HWY Only	Not Open
11N37F	1	HWY Only/Not Open	All Vehicles/Not Open	HWY Only/Not Open	Not Open	Not Open
11N37F	1	Not Open	HWY Only	Not Open	Not Open	Not Open
11N37HC	2	HWY Only	HWY Only	HWY Only	HWY Only	HWY Only
11N38B	21	Not Open	Not Open	Not Open	Not Open	Not Open
TINSOB	21	1401 Ороп	140t Open	140t Open	Not Open	HWY Only/Not
11N40B	19	All Vehicles	All Vehicles	HWY Only	Not Open	Open
11N40C	8	Not Open	Not Open	Not Open	Not Open	Not Open
11N40D	8	Not Open	Not Open	Not Open	Not Open	Not Open
11N40M	2	All Vehicles	All Vehicles	HWY Only	Not Open	Not Open
11N40N	3	Not Open	Not Open	Not Open	Not Open	Not Open
11N41A	1	Not Open	Not Open	Not Open	Not Open	Not Open
11N41AS	1	Not Open	Not Open	Not Open	Not Open	Not Open
11N42A	2	Not Open	Not Open	Not Open	Not Open	Not Open
11N44	8	HWY Only	HWY Only	HWY Only	HWY Only	HWY Only
11N46	3	All Vehicles	All Vehicles	All Vehicles	All Vehicles	All Vehicles
11N46A	1	HWY Only	HWY Only	HWY Only	HWY Only	HWY Only
11N46B	6	Not Open	Not Open	Not Open	Not Open	Not Open
11N46D	4	Not Open	Not Open	Not Open	Not Open	Not Open
11N46F	2	All Vehicles	All Vehicles	All Vehicles	Not Open	Not Open
11N46G	1	Not Open	Not Open	Not Open	Not Open	Not Open
11N46K	11	All Vehicles	All Vehicles	All Vehicles	Not Open	Not Open
11N46L	8	Not Open	Not Open	Not Open	Not Open	Not Open
11N46M	8	Not Open	Not Open	Not Open	Not Open	Not Open

	# Comments		Proposed			
	Received on	Alternative B	Designation	Alternative C	Alternative D	Alternative E
ID	Route	Allowed Uses	Modified B	Allowed Uses	Allowed Uses	Allowed Uses
11N46P	3	All Vehicles	All Vehicles	All Vehicles	All Vehicles	Not Open
11N47	2	All Vehicles	All Vehicles	All Vehicles		
11N47A	1	All Vehicles	Not Open	All Vehicles	Not Open	Not Open
11N47B	4	All Vehicles	Not Open	All Vehicles	Not Open	Not Open
11N47C	5	All Vehicles	All Vehicles	All Vehicles	Not Open	Not Open
11N47D	3	All Vehicles	All Vehicles	All Vehicles	Not Open	Not Open
11N48	2	Not Open	Not Open	Not Open	Not Open	Not Open
11N49	2	Not Open	All Vehicles	Not Open	Not Open	Not Open
11N49A	5	Not Open	Not Open	Not Open	Not Open	Not Open
11N49D	5	Not Open	All Vehicles	Not Open	Not Open	Not Open
11N50	4	Not Open	Not Open	Not Open	Not Open	Not Open
11N51	1	Not Open	Not Open	Not Open	HWY Only	Not Open
11N52	3	HWY Only	All Vehicles	HWY Only	Not Open	HWY Only
11N52A	2	Not Open	Not Open	Not Open	Not Open	Not Open
11N52B	1	HWY Only	HWY Only	HWY Only	HWY Only	HWY Only
11N54A	4	Not Open	Not Open	Not Open	Not Open	Not Open
11N54B	5	Not Open	Not Open	Not Open	HWY Only	Not Open
				All Vehicles/Hwy		HWY Only/Not
11N55	1	All Vehicles	All Vehicles	Only	Not Open	Open
11N55B	4	Not Open	Not Open	Not Open	Not Open	Not Open
11N55C	1	Not Open	Not Open	Not Open	Not Open	Not Open
11N56	4	All Vehicles	All Vehicles	All Vehicles	Not Open	HWY Only
11N56A	4	Not Open	Not Open	Not Open	Not Open	Not Open
11N56B	2	Not Open	Not Open	Not Open	Not Open	Not Open
11N57A	1	Not Open	Not Open	Not Open	Not Open	Not Open
11N59B	1	Not Open All Vehicles/Not	Not Open All Vehicles/Not	Not Open All Vehicles/Not	Not Open	Not Open HWY Only/Not
11N63	13	Open	Open	Open	Not Open	Open
11N63	39	All Vehicles	All Vehicles	HWY Only	Not Open	Not Open
11N64C	1	Not Open	Not Open	Not Open	Not Open	Not Open
1114031	ı ı	тот орон	тот ороп	1401 Ороп	140t Open	HWY Only/Not
11N70	11	All Vehicles	All Vehicles	All Vehicles	Not Open	Open
11N70B	39	Not Open	Not Open	Not Open	HWY Only	Not Open
11N70C	3	All Vehicles	Not Open	All Vehicles	Not Open	Not Open
11N73	1	All Vehicles	All Vehicles	All Vehicles	HWY Only	HWY Only
11N76	4	Not Open	Not Open	Not Open	HWY Only	Not Open
11N77A	1	All Vehicles	All Vehicles	HWY Only	OHV Only	HWY Only
		HWY Only/Not	All Vehicles/Not	HWY Only/Not	All Vehicles/Not	
11N79	40	Open	Open	Open	Open	Not Open
11N80	1	All Vehicles		All Vehicles	All Vehicles	All Vehicles
11N84B	1	Not Open	Not Open	Not Open	Not Open	Not Open
11N88	1	Not Open	Not Open	Not Open	Not Open	Not Open
11N98	9	HWY Only	HWY Only	HWY Only	HWY Only	HWY Only
11100		All Vehicles	HWY Only	All Vehicles/Hwy	LIM/V Only	HWV Only
11N99 11N99D	2 8	Not Open	HWY Only Not Open	Only Not Open	HWY Only HWY Only	HWY Only Not Open
	4	All Vehicles	All Vehicles	All Vehicles	Not Open	Not Open
11N99E 11N99J	3	Not Open	Not Open	Not Open	HWY Only	Not Open
11NY01	1	HWY Only	All Vehicles	HWY Only	Not Open	HWY Only
		HWY Only		HWY Only		Not Open
11NY02	1	•	All Vehicles All Vehicles		Not Open	Not Open Not Open
11NY03	1	Not Open		Not Open Not Open	Not Open	Not Open
11NY09	3	Not Open	Not Open	иот ореп	Not Open	тиот ореп

	# Comments Received on	Alternative B	Proposed Designation	Alternative C	Alternative D	Alternative E
ID	Route	Allowed Uses	Modified B	Allowed Uses	Allowed Uses	Allowed Uses
11NY14A	2	Not Open	Not Open	Not Open	Not Open	Not Open
11NY20A	31	OHV Only	OHV Only	Not Open	All Vehicles/Not Open	Not Open
11NY21C	1	All Vehicles	Not Open	All Vehicles	Not Open	Not Open
11NY27	6	All Vehicles	All Vehicles	HWY Only	Not Open	Not Open
11NY27A	6	All Vehicles	All Vehicles	HWY Only	Not Open	Not Open
11NY28	1	Not Open	Not Open	Not Open	Not Open	Not Open
11NY28C	1	Not Open	Not Open	Not Open	All Vehicles	Not Open
11NY29	1	All Vehicles	All Vehicles	All Vehicles	Not Open	All Vehicles
11NY30	1	HWY Only	HWY Only	HWY Only	Not Open	HWY Only
12E04	5	Non-Motorized Trail	Non-Motorized Trail	Non-Motorized Trail	Non-Motorized Trail	Non-Motorized Trail
12E06	5	Non-Motorized Trail	Non-Motorized Trail	Non-Motorized Trail	Non-Motorized Trail	Non-Motorized Trail
		Non-Motorized	Non-Motorized	Non-Motorized	Non-Motorized	Non-Motorized
12E07	3	Trail	Trail	Trail	Trail	Trail
12E11	2	Non-Motorized Trail	Non-Motorized Trail	Non-Motorized Trail	Non-Motorized Trail	Non-Motorized Trail
12511		Non-Motorized	Non-Motorized	Non-Motorized	Hall	Non-Motorized
12E30	2	Trail	Trail	Trail	Not Open	Trail
12N03	4	Not Open	Not Open	Not Open	Not Open	Not Open
12N10	4	Not Open	Not Open	Not Open	OHV Only	Not Open
12N22	41	HWY Only	All Vehicles	HWY Only	Not Open	HWY Only
12N22F	2	HWY Only	All Vehicles	HWY Only	HWY Only	HWY Only
12N23	2	HWY Only	HWY Only	HWY Only	HWY Only	HWY Only
12N24	11	HWY Only	HWY Only	HWY Only	HWY Only	HWY Only
12N24A	11	HWY Only	All Vehicles	HWY Only	Not Open	HWY Only
12N25C	2	All Vehicles	All Vehicles	HWY Only	Not Open	Not Open
12N27	2	Not Open	Not Open	Not Open	Not Open	Not Open
12N27A	2	Not Open	Not Open	Not Open	HWY Only	Not Open
12N28	2	HWY Only/Not Open	All Vehicles	HWY Only/Not Open	Not Open	HWY Only/Not Open
12N28CN	2	Not Open	All Vehicles	Not Open	Not Open	Not Open
12N28D	1	HWY Only	All Vehicles	HWY Only	Not Open	Not Open
12N28F	2	Not Open	Not Open	Not Open	Not Open	Not Open
12N29A	1	Not Open	Not Open	Not Open	Not Open	Not Open
12N29E	1	HWY Only	HWY Only	HWY Only	HWY Only	HWY Only
12N29H	1	HWY Only	HWY Only	HWY Only	HWY Only	HWY Only
12N29M	1	Not Open	Not Open	Not Open	Not Open	Not Open
12N29N	1	HWY Only	HWY Only	HWY Only	HWY Only	HWY Only
12N30B	6	Not Open	All Vehicles	Not Open	Not Open	Not Open
12N30F	2	Not Open	Not Open	Not Open	Not Open	Not Open
12N30JB	9	HWY Only	HWY Only	HWY Only	HWY Only	HWY Only
12N30K	3	Not Open	Not Open	Not Open	Not Open	Not Open
12N30P	1	Not Open	All Vehicles	Not Open	HWY Only	Not Open
12N30R	1	HWY Only	HWY Only	HWY Only	HWY Only	HWY Only
12N32A	1	HWY Only	All Vehicles	HWY Only	Not Open	HWY Only
12N33	1	HWY Only	HWY Only	HWY Only	HWY Only	HWY Only
12N33B	1	Not Open	Not Open	Not Open	All Vehicles	Not Open
12N34A	1	Not Open	Not Open	Not Open	Not Open	Not Open
12N34C	1	Not Open	Not Open	Not Open	Not Open	Not Open
12N35	1	Not Open	Not Open	Not Open	Not Open	Not Open

	# Comments		Proposed			
	Received on	Alternative B	J	Alternative C	Alternative D	Alternative E
ID	Route	Allowed Uses	Modified B	Allowed Uses	Allowed Uses	Allowed Uses
12N35F	1	HWY Only	HWY Only	HWY Only	HWY Only	HWY Only
12N35G	1	HWY Only	HWY Only	HWY Only	HWY Only	HWY Only
12N36D	1	Not Open	Not Open	Not Open	Not Open	Not Open
12N36F	2	Not Open	Not Open	Not Open	Not Open	Not Open
12N37	2	Not Open	All Vehicles	Not Open	HWY Only	Not Open
12N37A	1	HWY Only	All Vehicles	HWY Only	Not Open	HWY Only
12N39	42	Not Open	Not Open	Not Open	Not Open	Not Open
12N39A	4	Not Open	Not Open	Not Open	Not Open	Not Open
12N39B	4	Not Open	Not Open	Not Open	Not Open	Not Open
12N39C	4	Not Open	Not Open	Not Open	HWY Only	Not Open
						HWY Only/Not
12N40A	41	HWY Only	All Vehicles	HWY Only	Not Open	Open
12N43	2	HWY Only	All Vehicles	HWY Only	Not Open	Not Open
12N43A	6	Not Open	All Vehicles	Not Open	Not Open	Not Open
12N43B	2	Not Open	All Vehicles	Not Open	Not Open	Not Open
12N45	2	Not Open	Not Open	Not Open	Not Open	Not Open
12N46	3	Not Open	Not Open	Not Open	Not Open	Not Open
12N47	1	All Vehicles	All Vehicles	All Vehicles	Not Open	Not Open
12N47A	2	All Vehicles	All Vehicles	All Vehicles	Not Open	Not Open
12N47B	2	All Vehicles	All Vehicles	All Vehicles	Not Open	Not Open
12N47C	4	All Vehicles	Not Open	All Vehicles	HWY Only	Not Open
12N51A	2	HWY Only	All Vehicles	HWY Only	HWY Only	HWY Only
40150		HWY Only/Not	All Vehicles/Not	HWY Only/Not	National	HWY Only/Not
12N52	2	Open	Open	Open	Not Open	Open
12N52CB	5	Not Open	Not Open	Not Open	Not Open	Not Open
12N52CC	2	Not Open	Not Open	Not Open	Not Open	Not Open
12N52D	1	Not Open	Not Open	Not Open	Not Open	Not Open
12N52DW	3	Not Open	Not Open	Not Open	Not Open	Not Open
12N53	19	Not Open	Not Open	Not Open	Not Open	Not Open
12N53A	2	Not Open	Not Open	Not Open	Not Open	Not Open
12N53B	2	Not Open	Not Open	Not Open	All Vehicles	Not Open
12N54	21	All Vehicles	All Vehicles	All Vehicles	Not Open	All Vehicles
12N54A	1	Not Open	Not Open	Not Open	Not Open	Not Open
12N54B	2	Not Open	Not Open	Not Open	Not Open	Not Open
12N55	7	Not Open All Vehicles/Not	Not Open All Vehicles/Not	Not Open All Vehicles/Not	All Vehicles Not Open/Ohv	Not Open All Vehicles/Not
12N56	7	Open	Open	Open	Only	Open
121130	,	OHV Only/Not	All Vehicles/Ohv	Ореп	Offig	Motorcycles
12N56B	1	Open	Only	Not Open	Not Open	Only/Not Open
12N56F	4	HWY Only	All Vehicles	HWY Only	Not Open	Not Open
12N56G	1	Not Open	All Vehicles	Not Open	All Vehicles	Not Open
12N59A	20	Not Open	Not Open	Not Open	Not Open	Not Open
12N60B	39	HWY Only	Not Open	HWY Only	Not Open	Not Open
12N60P	2	Not Open	Not Open	Not Open	Not Open	Not Open
12N64A	10	Not Open	Not Open	Not Open	Not Open	Not Open
12N65	2	Not Open	Not Open	Not Open	Not Open	Not Open
12N67B	2	Not Open	Not Open	Not Open	Not Open	Not Open
12N68B	1	Not Open	Not Open	Not Open	All Vehicles	Not Open
12N68E	2	All Vehicles	All Vehicles	All Vehicles	Not Open	All Vehicles
12N68F	35	Not Open	Not Open	Not Open	Not Open	Not Open
12N68H	30	All Vehicles	Not Open	All Vehicles	Not Open	Not Open
12N70	1	HWY Only	HWY Only	HWY Only	HWY Only	HWY Only
12N/U	l	LIVVI OIIIY	LIVVI OIIIY	LIVVI OIIIY	LIVVI OIIIY	LIVVI OIIIY

	# Comments Received on	Alternative B	Proposed Designation	Alternative C		Alternative E
ID	Route	Allowed Uses	Modified B	Allowed Uses	Allowed Uses	Allowed Uses
12N77	1	Not Open				
12N78	3	Not Open				
12N78A	2	Not Open				
12N80	5	HWY Only				
12N80F	1	HWY Only				
12N90	2	Not Open				
12N92	1	Not Open				
12N99	22	HWY Only	All Vehicles	HWY Only	Not Open	HWY Only
12NY04	6	All Vehicles	All Vehicles	All Vehicles	Not Open	All Vehicles
12NY04B	6	Not Open	All Vehicles	Not Open	Not Open	Not Open
12NY04C	2	Not Open	Not Open	Not Open	All Vehicles	Not Open
12NY05	15	All Vehicles	All Vehicles	All Vehicles	Not Open	Not Open
12NY05A	53	Not Open				
12NY05B	15	All Vehicles	All Vehicles	All Vehicles	All Vehicles	Not Open
	1	1				All Vehicles/Not
12NY06	30	All Vehicles	All Vehicles	All Vehicles	All Vehicles	Open
		All Vehicles/Not	All Vehicles/Not	HWY Only/Not		
12NY15A	3	Open	Open	Open	Not Open	Not Open
12NY15B	5	All Vehicles	All Vehicles	HWY Only	Not Open	Not Open
12NY15C	2	Not Open				
12NY15D	2	All Vehicles	All Vehicles	HWY Only	Not Open	Not Open
12NY25A	1	Not Open				
12NY30	1	Not Open				
		Non-Motorized	Non-Motorized	Non-Motorized	Non-Motorized	Non-Motorized
13E05	1	Trail	Trail	Trail	Trail	Trail
		Non-Motorized	Non-Motorized	Non-Motorized	Non-Motorized	Non-Motorized
13E06	1	Trail	Trail	Trail	Trail	Trail
40507		Non-Motorized Trail	Non-Motorized	Non-Motorized Trail		Non-Motorized Trail
13E07	8	Non-Motorized	Trail Non-Motorized	Non-Motorized	Trail Non-Motorized	Non-Motorized
13E08	1	Trail	Trail	Trail	Trail	Trail
13200	'	Non-Motorized	Non-Motorized	Non-Motorized		Non-Motorized
13E09	2	Trail	Trail	Trail	Trail	Trail
				Motorcycles		Motorcycles
13E34	5	Motorcycles Only	Motorcycles Only		Motorcycles Only	
				Motorcycles		Motorcycles
13E40	5	Motorcycles Only			HWY Only	Only
13N11A	1	Not Open				
		All Vehicles/Not	A II > / / · ·	HWY Only/Not	N : 0	HWY Only/Not
13N12	25	Open	All Vehicles	Open	Not Open	Open
13N12A	3	All Vehicles	All Vehicles	HWY Only	Not Open	Not Open
13N12C	3	All Vehicles	All Vehicles	HWY Only	Not Open	Not Open
13N13C	16	All Vehicles	All Vehicles	HWY Only	Not Open	Not Open
13N14	16	Not Open				
13N14A	16	HWY Only				
	_	All Vehicles/Not	A II > / - L ! - !	HWY Only/Not	Hwy Only/Not	HWY Only/Not
13N15	6	Open	All Vehicles	Open	Open	Open
13N15A	3	All Vehicles	All Vehicles	HWY Only	Not Open	HWY Only
13N15B	3	All Vehicles	All Vehicles	HWY Only	HWY Only	Not Open
		Allazzatera	A II > / - L ' - !	1,0407,011	No. C	HWY Only/Not
13N15C	2	All Vehicles	All Vehicles	HWY Only	Not Open	Open
13N17B-F	8	HWY Only				
13N17C	8	HWY Only				

	# Comments		Proposed			
	Received on	Alternative B	Designation	Alternative C	Alternative D	Alternative E
ID	Route	Allowed Uses	Modified B	Allowed Uses	Allowed Uses	Allowed Uses
13N18B	3	HWY Only	HWY Only	HWY Only	HWY Only	HWY Only
	_			HWY Only/Not	Hwy Only/Not	HWY Only/Not
13N19A	5	HWY Only All Vehicles/Not	All Vehicles	Open HWY Only/Not	Open Hwy Only/Not	Open HWY Only/Not
13N20	5	Open	Not Open	Open	Open	Open
13N22	1	Not Open	Not Open	Not Open	Not Open	Not Open
13N22AB	1	Not Open	Not Open	Not Open	Not Open	Not Open
13N22CB	3	All Vehicles	All Vehicles	HWY Only	Not Open	HWY Only
						HWY Only/Not
13N22H	1	HWY Only	All Vehicles	HWY Only	Not Open	Open
13N22N	1	Not Open	All Vehicles	Not Open	Not Open	Not Open
13N22Q	2	Not Open	Not Open	Not Open	Not Open	Not Open
13N22R	2	Not Open	All Vehicles	Not Open	Not Open	Not Open
13N22S	1	Not Open	Not Open	Not Open	Not Open	Not Open
13N23	6	HWY Only	HWY Only	HWY Only	HWY Only	HWY Only
13N25B	2	Not Open	Not Open	Not Open	All Vehicles	Not Open
13N26	4	HWY Only	HWY Only	HWY Only	HWY Only	HWY Only
13N26B-B	2	HWY Only	HWY Only	HWY Only	HWY Only	HWY Only
401100	4	All Vehicles	All Vehicles	All Vehicles/Hwy	All Vehicles/Not	All Vehicles/Hwy
13N28 13N31B	1	All Vehicles	All Vehicles	Only HWY Only	Open Not Open	Only Not Open
13N33	3	Not Open	All Vehicles	Not Open	Not Open	Not Open
13N33A	2	Not Open	Not Open	Not Open	Not Open	Not Open
13N34	1	Not Open	Not Open	Not Open	Not Open	Not Open
13N34A	17	Not Open	Not Open	Not Open	Not Open	Not Open
13N39	2	Not Open	Not Open	Not Open	Not Open	Not Open
13N39A	32	Not Open	Not Open	Not Open	Not Open	Not Open
13N39B	1	Not Open	All Vehicles	Not Open	Not Open	Not Open
13N40	1	Not Open	Not Open	Not Open	Not Open	Not Open
13N42BW	1	Not Open	Not Open	Not Open	HWY Only	Not Open
13N42C	1	HWY Only	Not Open	Not Open	Not Open	Not Open
13N42G	2	Not Open	Not Open	Not Open	Not Open	Not Open
13N44A	38	Not Open	Not Open	Not Open	Not Open	Not Open
			All Vehicles/Not	·	·	·
13N44C	1	Not Open	Open	Not Open	•	Not Open
13N48	1	Not Open	Not Open	Not Open	Not Open	Not Open
42NE2	4	HWY Only/Not	All Vehicles/Not	Not Open	Not Open	Not Open
13N53	1	Open HWY Only	Open All Vehicles	Not Open	Not Open	Not Open
13N53B	3	•		Not Open Not Open	Not Open	Not Open
13N53D 13N53W	5 7	Not Open Not Open	Not Open Not Open	Not Open	Not Open Not Open	Not Open Not Open
ISNOSW	1	пот Ореп	Not Open	Not Open	Not Open	HWY Only/Not
13N56	1	HWY Only	All Vehicles	HWY Only	Not Open	Open
13N58H	5	Not Open	Not Open	Not Open	Not Open	Not Open
13N58J	5	HWY Only	HWY Only	HWY Only	HWY Only	HWY Only
13N58N	96	Not Open	Not Open	Not Open	Not Open	Not Open
13N58P	28	Not Open	Not Open	Not Open	Not Open	Not Open
13N58R	13	Not Open	Not Open	Not Open	Not Open	Not Open
13N58T	8	Not Open	Not Open	Not Open	HWY Only	Not Open
13N60	7	HWY Only	All Vehicles	HWY Only	HWY Only	HWY Only
13N60A	26	HWY Only	All Vehicles	HWY Only	Not Open	HWY Only
13N61	26	Not Open	Not Open	Not Open	Not Open	Not Open

	# Comments		Proposed			
	Received on	Alternative B	Designation	Alternative C	Alternative D	Alternative E
ID	Route	Allowed Uses	Modified B	Allowed Uses	Allowed Uses	Allowed Uses
13N61B	2	Not Open	Not Open	Not Open	Not Open	Not Open
13N61C	9	Not Open	Not Open	Not Open	Not Open	Not Open
13N62	1	Not Open	Not Open	Not Open	HWY Only	Not Open
13N66	1	HWY Only	All Vehicles	HWY Only	HWY Only	HWY Only
13N68	14	All Vehicles	All Vehicles	All Vehicles	HWY Only	HWY Only
131100	17	HWY Only/Not	All Vehicles/Not	HWY Only/Not	11111 01111	······
13N69	1	Open	Open	Open	Not Open	Not Open
13N69A	4	Not Open	Not Open	Not Open	HWY Only	Not Open
13N69B	1	HWY Only	All Vehicles	HWY Only	Not Open	Not Open
13N69C	1	Not Open	Not Open	Not Open	Not Open	Not Open
		'		'	Hwy Only/Not	HWY Only/Not
13N72	1	All Vehicles	All Vehicles	HWY Only	Open	Open
						HWY Only/Not
13N72A	1	All Vehicles	All Vehicles	HWY Only	Not Open	Open
13N73	3	All Vehicles	All Vehicles	HWY Only	Not Open	HWY Only
13N74	21	All Vehicles	All Vehicles	HWY Only	Not Open	Not Open
13N76	2	HWY Only	All Vehicles	HWY Only	Not Open	HWY Only
13N77	4	All Vehicles	All Vehicles	All Vehicles	All Vehicles	Not Open
13N85	6	HWY Only	All Vehicles	HWY Only	HWY Only	HWY Only
13N86	2	All Vehicles	All Vehicles	HWY Only	HWY Only	HWY Only
13N86A	1	All Vehicles	All Vehicles	HWY Only	Not Open	HWY Only
13N87	1	Not Open	Not Open	Not Open	Not Open	Not Open
13N88	26	Not Open	All Vehicles	Not Open	Not Open	Not Open
	_	HWY Only/Not	All Vehicles/Not	HWY Only/Not	N 0	HWY Only/Not
13N91	1	Open Non-Motorized	Open Non-Motorized	Open Non-Motorized	Not Open Non-Motorized	Open Non-Motorized
14E01	1	Trail	Trail	Trail	Trail	Trail
14601	· · · · · · · · · · · · · · · · · · ·	Motorcycles	Motorcycles	Trail	Motorcycles	Motorcycles
		Only/Non-	Only/Non-	Non-Motorized	Only/Non-	Only/Non-
14E04	6	Motorized Trail	Motorized Trail	Trail	Motorized Trail	Motorized Trail
				Non-Motorized	Non-Motorized	Motorcycles
14E09	10	Motorcycles Only		Trail	Trail	Only
			Non-Motorized	Non-Motorized		Non-Motorized
14E10	11	Motorcycles Only	Trail	Trail	Motorcycles Only Non-Motorized	
14511	11	Motorcycles Only	Motorcycles Only	Non-Motorized	Trail	Non-Motorized Trail
14E11	11	Motorcycles	INICIOICYCIES Office	TIGII	Hall	Trail
		Only/Non-	Non-Motorized	Non-Motorized	Non-Motorized	Non-Motorized
14E14	12	Motorized Trail	Trail	Trail	Trail	Trail
		Motorcycles	Motorcycles	Motorcycles		Motorcycles
		Only/Non-	Only/Non-	Only/Non-	Non-Motorized	Only/Non-
14E25	1	Motorized Trail	Motorized Trail	Motorized	Trail/Ohv Only	Motorized Trail
		OHV Only/Motorcycles	OHV Only/Motorcycles	Motorcycles		Motorcycles
14E26	1	Only	Only	Only	Motorcycles Only	,
17620	<u>'</u>	J.113	J.",	Motorcycles	otoroyolog Offiy	Motorcycles
14E27	3	Motorcycles Only	Motorcycles Only	Only	Motorcycles Only	_
			, ,	,	, ,	Motorcycles
				Motorcycles		Only/Non-
14E31	3	Motorcycles Only	Motorcycles Only		Motorcycles Only	
4.500		Matanaustra	Matanavalis	Motorcycles	Matanaustra	Motorcycles
14E32	1	Motorcycles Only	iviotorcycles Only	Only Motorcycles	Motorcycles Only	Only Motorcycles
14E34	1	Motorcycles Only	Motorcycles Only	Only	OHV Only	Only
17234	]	INICIOI CYCIES Office	IVIOLOTO GOLOGO OTILY	Crity	Of the Offing	Crity

ID	# Comments Received on Route	Alternative B	Proposed Designation Modified B	Alternative C	Alternative D	Alternative E
						Motorcycles
14E35	2	OHV Only	OHV Only	OHV Only	Motorcycles Only	
14N04	39	All Vehicles	All Vehicles	All Vehicles	All Vehicles	Not Open
4.45105	44	All Vehicles/Not	A II \ / a b : a l a a	All Vehicles/Not	All Vehicles/Not	Not On an
14N05	41	Open All Vehicles/Not	All Vehicles All Vehicles/Not	Open All Vehicles/Hwy	Open Hwy Only/Not	Not Open All Vehicles/Hwy
14N06	16	Open	Open	Only/Not Open	Open	only/ Not Open
14N07	4	All Vehicles	All Vehicles	All Vehicles	All Vehicles	All Vehicles
14N08	2	7 til VOI lioloo	7 til VOI IIOIOO	7111 V 01110100	7111 V 01110100	7111 VOITIOIOO
14N08A	1	HWY Only	All Vehicles	HWY Only	Not Open	HWY Only
14N08J	1	HWY Only	All Vehicles	HWY Only	Not Open	HWY Only
14N09	40	Tivvi Only	7 til VCIIICICS	Tivvi Only	Not Open	Tivvi Only
14N09A	35	All Trail Vehicles	All Trail Vehicles	OHV Only	Not Open	All Trail Vehicles
14103A	33	All ITall Verlicles	All ITall Verlicles	Offiv Offing	All Vehicles/Not	All ITall Verlicles
14N10	3	All Vehicles	All Vehicles	All Vehicles	Open	All Vehicles
14N10H	1	HWY Only	Not Open	HWY Only	HWY Only	Not Open
		HWY Only/Not	All Vehicles/Not		Motorcycles	
14N11	6	Open	Open	Not Open	Only/Not Open	Not Open
14N11C	1	Not Open	Not Open	Not Open	Not Open	Not Open
14N11D	1	Not Open	Not Open	Not Open	Motorcycles Only	Not Open
		Motorcycles	Motorcycles		All Vehicles/Not	·
14N11E	4	Only/Not Open	Only/Not Open	Not Open	Open	Not Open
						All Vehicles/Not
14N12	4	All Vehicles	All Vehicles	All Vehicles	Not Open	Open
14N12C	2	Not Open	All Vehicles	Not Open	Not Open	Not Open
14N12D	2	All Vehicles	All Vehicles	Not Open	Not Open	Not Open
14N15	6	Not Open	Not Open	Not Open	Not Open	Not Open
14N15A	3	Not Open	Not Open	Not Open	Not Open	Not Open
14N16	3	Not Open	All Vehicles	Not Open	Not Open	Not Open
14N17	4	All Vehicles	All Vehicles	HWY Only	Not Open	HWY Only
14N17B	1	All Vehicles	All Vehicles	HWY Only	Not Open	HWY Only
14N19	2	All Vehicles	All Vehicles	All Vehicles	Not Open	All Vehicles
14N19B	2	Not Open	Not Open	Not Open	All Vehicles	Not Open
					Hwy Only/Not	All Vehicles/Hwy
14N20	4	All Vehicles		All Vehicles	Open	only/ Not Open
14N20B	2	HWY Only	All Vehicles	HWY Only	All Vehicles	Not Open
14N25	13					
14N25B	1	HWY Only	Not Open	HWY Only	Not Open	Not Open
4.4N05.0	10	HWY Only/Not	All Vehicles/Not	HWY Only/Not	Not Open	HWY Only/Not
14N25G	12	Open All Vehicles/Not	Open All Vehicles/Not	Open	Not Open	Open
14N26	8	Open	Open	All Vehicles	Not Open	Not Open
14N26B	42	Not Open	Not Open	Not Open	Not Open	Not Open
	74			HWY Only/Not	тот ороп	
14N27	46	All Vehicles	All Vehicles	Open	Not Open	Not Open
14N27B	1	Not Open	Not Open	Not Open	Not Open	Not Open
14N27C	2	Not Open	Not Open	Not Open	Not Open	Not Open
14N27D	4	Not Open	Not Open	Not Open	Not Open	Not Open
14N27E	2	Not Open	Not Open	Not Open	Not Open	Not Open
14N27F	2	Not Open	All Vehicles	Not Open	Not Open	Not Open
14N27G	2	Not Open	Not Open	Not Open	Not Open	Not Open
14N27K	2	Not Open	Not Open	Not Open	Not Open	Not Open
14N27W	46	Not Open	Not Open	Not Open	Not Open	Not Open
1	70		,		1	

ID	# Comments Received on Route	Alternative B	Proposed Designation Modified B	Alternative C	Alternative D	Alternative E	
14N30	2	Not Open	Not Open	Not Open	Not Open	Not Open	
14N30A	35	Not Open	Not Open	Not Open	All Vehicles	Not Open	
14N31	1	All Vehicles	All Vehicles	All Vehicles Not Open		All Vehicles	
14N34A	7	All Vehicles	All Vehicles	All Vehicles	Not Open	All Vehicles	
14N34B	22	Not Open	Not Open	Not Open	Not Open	Not Open	
14N34C	2	Not Open	Not Open	Not Open	Not Open	Not Open	
14N34D	1	Not Open	Not Open	Not Open	Not Open	Not Open	
14N34E	3	Not Open	Not Open	Not Open	All Vehicles	Not Open	
14N35	22	All Vehicles/Hwy Only	All Vehicles/Hwy Only	All Vehicles/Hwy Only	HWY Only/All Vehicles	All Vehicles/Hwy Only	
14N35A	4	All Vehicles	All Vehicles/Not Open	All Vehicles	Not Open	All Vehicles	
14N35B	3	Not Open	HWY Only	Not Open	Not Open	Not Open	
14N35E	4	Not Open	HWY Only	Not Open	Not Open	Not Open	
14N35F	21	Not Open	Not Open	Not Open	Not Open	Not Open	
14N35H	36	Not Open	Not Open	Not Open	HWY Only	Not Open	
14N36	1	All Vehicles	All Vehicles	All Vehicles	HWY Only	HWY Only	
14N38	8	All Vehicles	All Vehicles	All Vehicles	Not Open	HWY Only	
14N38C	2	All Vehicles	All Vehicles	All Vehicles	All Vehicles	Not Open	
14N39	10	All Vehicles	All Vehicles	All Vehicles	HWY Only Hwy Only/Not	Not Open HWY Only/Not	
14N40	4	All Vehicles	All Vehicles	All Vehicles	Open	Open	
14N40A	2	All Vehicles	All Vehicles	All Vehicles	HWY Only	Not Open	
14N41	2	All Vehicles	Not Open	All Vehicles	HWY Only	Not Open	
14N42	1	HWY Only	All Vehicles	HWY Only	Not Open	HWY Only	
14N51	24	Not Open	All Vehicles	Not Open	Not Open	Not Open	
14N51A	8	Not Open	All Vehicles	Not Open	Not Open	Not Open	
14N51B	3	Not Open	All Vehicles	Not Open	Not Open	Not Open	
14N52	4	Not Open	Not Open	Not Open	Not Open	Not Open	
14N53	1	Not Open	Not Open	Not Open	Not Open	Not Open	
14N53A	20	Not Open	Not Open	Not Open	Not Open	Not Open	
14N54	35	All Vehicles	All Vehicles	All Vehicles	Not Open	Not Open	
14N55	2	Not Open	Not Open	Not Open	Not Open	Not Open	
14N57	22	Not Open	Not Open	Not Open	Not Open	Not Open	
14N57B	18	Not Open	Not Open	Not Open	Not Open	Not Open	
14N58	24	All Vehicles	All Vehicles	All Vehicles	Not Open	Not Open	
14N58A	45	All Vehicles	All Vehicles	Not Open	Not Open	Not Open	
14N58B	1	All Vehicles	All Vehicles	Not Open	Not Open	Not Open	
14N59	7	All Vehicles	All Vehicles	All Vehicles	Not Open	Not Open	
14N59A	6	Not Open	Not Open	Not Open	Not Open Non-Motorized	Not Open	
14N60	4	Not Open Non-Motorized	Not Open Non-Motorized	Not Open Non-Motorized	Trail Non-Motorized	Not Open Non-Motorized	
15E02	4	Trail Non-Motorized	Trail Non-Motorized	Trail Non-Motorized	Trail Non-Motorized	Trail Non-Motorized	
16E20	1	Trail Motorcycles	Trail Motorcycles	Trail	Trail	Trail	
17E12	10	Only/Non- Motorized Trail	Only/Non- Motorized Trail	Non-Motorized Trail	Non-Motorized Trail	Non-Motorized Trail	
17E14	1	Non-Motorized Trail	Non-Motorized Trail	Non-Motorized Trail	Non-Motorized Trail	Non-Motorized Trail	

ID	# Comments Received on Route	Alternative B Allowed Uses	Proposed Designation Modified B	Alternative C Allowed Uses	Alternative D Allowed Uses	Alternative E Allowed Uses
		Motorcycles	Motorcycles	** ** ** ***		
		Only/Non-	Only/Non-	Non-Motorized	Matana alaa Oal	Non-Motorized
7E16	11	Motorized Trail	Motorized Trail	Trail	Motorcycles Only Non-Motorized	rall Non-Motorized
7E17	6	Motorcycles Only	Motorcycles Only	Motorcycles	Trail	Trail
/61/	6	Motorcycles Offiy	Motorcycles Orlly	Non-Motorized	Non-Motorized	Non-Motorized
7E19	14	OHV Only	Motorcycles Only		Trail	Trail
	• •	Non-Motorized	Non-Motorized	Non-Motorized		Non-Motorized
7E20	12	Trail	Trail	Trail	Motorcycles Only	Trail
		Motorcycles	Motorcycles		Motorcycles	
		Only/Non-	Only/Non-	Non-Motorized	Only/Non-	Non-Motorized
7E21	18	Motorized Trail	Motorized Trail	Trail	Motorized Trail	Trail
		Motorcycles	Motorcycles			Motorcycles
		Only/Non-	Only/Non-	Non-Motorized	Non-Motorized	Only/Non-
7E22	1	Motorized Trail	Motorized Trail	Trail	Trail All Vehicles/All	Motorized Trail
		All Trail	All Trail	OLIV Only/Non	Trail	All Vahialas/Nan
7504	4.5	Vehicles/Non-	Vehicles/Non-	OHV Only/Non-	Vehicles/Non-	All Vehicles/Non
'E24	15	Motorized Trail	Motorized Trail	Motorized Trail Non-Motorized	Motorized Trail Non-Motorized	-Motorized Trail Non-Motorized
E28	5	Motorcycles Only	Motorcycles Only		Trail	Trail
LZO	3	Non-Motorized	Non-Motorized	Non-Motorized	Non-Motorized	Non-Motorized
E46	2	Trail	Trail	Trail	Trail	Trail
_40	2	Non-Motorized	Non-Motorized	Non-Motorized	Non-Motorized	Non-Motorized
49	2	Trail	Trail	Trail	Trail	Trail
	_			Non-Motorized	Non-Motorized	Non-Motorized
E51	11	Motorcycles Only		Trail	Trail	Trail
		Non-Motorized	Non-Motorized	Non-Motorized	Non-Motorized	Non-Motorized
52	5	Trail Motorcycles	Trail	Trail	Trail	Trail
		Only/Non-	Non-Motorized	Non-Motorized	Non-Motorized	Non-Motorized
E63	9	Motorized Trail	Trail	Trail	Trail	Trail
		Non-Motorized	Non-Motorized	Non-Motorized	Non-Motorized	Non-Motorized
E71	10	Trail	Trail	Trail	Trail	Trail
N40	•	All Vahieles	Not Ones	All Mobieles	All Vehicles/Not	All Vahialas
N12	6	All Vehicles	Not Open	All Vehicles	Open	All Vehicles
N12K	1	HWY Only	HWY Only	HWY Only	Not Open	HWY Only
N12P	1	HWY Only	All Vehicles	HWY Only	Not Open	HWY Only
N12U	1	HWY Only Non-Motorized	HWY Only Non-Motorized	HWY Only Non-Motorized	Not Open	HWY Only Non-Motorized
3E21	1	Trail	Trail	Trail	All Trail Vehicles	
	<del>-</del>	Non-Motorized	Non-Motorized	Non-Motorized	Non-Motorized	Non-Motorized
<b>≣04</b>	3	Trail	Trail	Trail	Trail	Trail
D-147	2	Not Open	Not Open	Not Open	Not Open	Not Open
R1128E	1	HWY Only	HWY Only	Not Open	Not Open	HWY Only
R1199A-B	1	All Vehicles	All Vehicles	Not Open	Not Open	HWY Only
R1230BA	1	Not Open	Not Open	Not Open	Not Open	Not Open
SRELD-147-DB	1	Not Open	Not Open	Not Open	Not Open	Not Open
		•		-	•	onetopen onetoc321p4a7a811Veho
SRELD-63-AA	1	Not Open Nail		•	<b>pen</b> Not Open Not 31-S1T-222222222	